IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

PRASHANT KALAVAR and)
SHWETA KALAVAR,)
Plaintiff,)
) CIVIL ACTION FILE NO.
vs.)
CAPECO INCLIDANCE COMPANY)
SAFECO INSURANCE COMPANY)
OF INDIANA)
)
Defendant.)

<u>DEFENDANT SAFECO INSURANCE COMPANY OF INDIANA'S</u> <u>NOTICE OF REMOVAL</u>

COMES NOW Safeco Insurance Company of Indiana (hereafter "Safeco"), and files its Notice of Removal pursuant to Fed. R. Civ. P. 81(c) and 28 U.S.C. §§ 1441 and 1446(a) and (b).

1.

The Plaintiffs have filed a civil action against Safeco in the State Court of DeKalb County, Georgia, Civil Action File No. 23A02822, (the "underlying action") which is located within the Atlanta Division of the United States District Court for the Northern District of Georgia. <u>See</u> 28 U.S.C. § 90(a)(2).

2.

The Plaintiffs filed their Complaint in the underlying action on or about June 23, 2023. (Exhibit "A", Complaint.) The Summons and Complaint was served on Safeco on or about June 26, 2023. (Id.)

3.

In their Complaint, Plaintiffs allege that they "Georgia Residents". (Ex. A, Complaint, ¶ 1.) Plaintiffs further allege that their cause of action arises out of damage to their "home located at 8030 Prestwick Circle, Duluth, Georgia 30097-6673 ("Subject Property" or the "home"). (Id. at ¶ 5.) The Plaintiffs are citizens of the State of Georgia.

4.

Safeco is an insurance company organized and existing under the laws of the State of Indiana, with its principal place of business located at 175 Berkely Street, Boston, Massachusetts. There is no evidence that either Plaintiff is a citizen of either Indiana or Massachusetts.

5.

Therefore, at the time of removal, the Complaint asserts claims by two citizens of the State of Georgia against only a non-citizen Defendant, Safeco, and there is complete diversity of citizenship.

6.

In the Complaint, Plaintiff alleges that he made a demand prior to filing suit. (Complaint, ¶ 16.) Plaintiff demanded payment of the repairs as outlined in the attached estimate, which totaled \$113,371.60. (A copy of Plaintiff's demand is attached hereto as Exhibit "B.") Thus, Plaintiff's claim is an amount in controversy which exceeds \$75,000.00, exclusive of interest and costs.

7.

This is a civil action of which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1332 based on complete diversity of citizenship among the parties and which may be removed to this Court pursuant to 28 U.S.C. § 1441.

8.

This Notice of Removal is filed within thirty (30) days of the date of service of the Complaint on Safeco.

9.

Defendant attaches as Exhibit "A" to this original pleading only, the entire record in the State Court of DeKalb County, Georgia action.

10.

The undersigned has read this Notice of Removal, and to the best of the undersigned's knowledge, information and belief, formed after reasonable inquiry,

it is well-grounded in fact and is warranted by existing law, and it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.

WHEREFORE, Defendant hereby removes this action to the United States

District Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted this 25th day of July 2023.

ISENBERG & HEWITT, P.C.

/s/ Hilary W. Hunter
Hilary W. Hunter
Georgia Bar No. 742696
600 Embassy Row, Suite 150
Atlanta, Georgia 30328
(770) 351-4400 Telephone
(770) 828-0100 Facsimile
Attorney for Defendant
Safeco Insurance Company of Indiana

EXHIBIT A

23A02822	STATE COURT OF DEKALB COUNTY
No	GEORGIA, DEKALB COUNTY
Date Summons Issued and E-Filed	
6/23/2023	SUMMONS
/s/ Monica Gay	
Deputy Clerk	
Deposit Paid \$	Prashant Kalauma and Shwetz Kalavar
	47 Perimeter Ctr. F. Str. 530 Plaintiff's name and address 0 546 Atlanta, 64. 30546 vs.
[X JURY	Superior Thousance Company of Indiana 2 Sun Court Ste 400 Rabbres Corners, GA. Defendant's name and address' 3009
	2 Sun Court Ste 400 Parties Corners, OA. Defendant's name and address 30092
TO THE ABOVE-NAMED DEFENDANT:	
Administrative Tower, DeKalb County Cou 30030 and serve upon the plaintiff's attorn Name Name Address Phone Number an ANSWER to the complaint which is he service upon you, exclusive of the day of taken against you for the relief demanded	Georgia Bar No. rewith served upon you, within thirty (30) days after service. If you fail to do so, judgment by default will be in the complaint. The answer or other responsive
pleading can be filed via electronic filing through	gh eFileGA via www.eFileGA.com or, if desired, at the e-filing public cDonough Street, Decatur, Georgia 30030
Defendant's Attorney	Third Party Attorney
Address	Address
Phone No. Georgia	Bar No. Phone No. Georgia Bar No.
	TYPE OF SUIT
☐ Personal Injury ☐ Products Liability	Principal \$ \(\bar{\pi} \)
 □ Contract □ Medical Malpractice □ Legal Malpractice □ Product Liability 	Interest \$,
Other	Atty Fees \$ \(\square\ B \rangle \)
To indicate consent to e-service check	is available at www.dekalbstatecourt.net

E-file summons1-2016

STATE COURT OF DEKALB COUNTY, GA. 6/23/2023 4:34 PM E-FILED BY: Monica Gay

IN THE STATE COURT OF DEKALB COUNTY STATE OF GEORGIA

PRASHANT KALAVAR and SHWETA KALAVER,

Plaintiffs,

VS.

CIVIL ACTION NO. 23A02822

JURY TRIAL REQUESTED

DEFENDANT SAFECO INSURANCE COMPANY OF INDIANA,

Defendant.

PLAINTIFFS' COMPLAINT

COMES NOW Steph, Plaintiffs herein, by and through their undersigned counsel of record, and submits this, their Complaint for Damages, hereby stating as follows:

JURISDICTION AND VENUE

- Plaintiffs Prashant Kalavar and Shweta Kalavar (collectively "Plaintiffs") are Georgia Residents.
- 2. Defendant Safeco Insurance Company of Indiana ("Defendant" or "Safeco") is a foreign insurance company that maintains a duly registered agent and office with the Georgia Secretary of State. This Court has subject matter jurisdiction over Defendant pursuant to Georgia Constitution of 1983, Article VI, Section IV, Paragraph I and O.C.G.A. §15-7-4. This Court has personal jurisdiction over Defendant pursuant to Georgia's Long-Arm Statute: O.C.G.A. § 9-10-91. Personal jurisdiction over Defendant will be perfected through service upon its registered agent Corporation Service Company at its registered office located at 2 Sun Court, Suite 400, Peachtree Corners, Georgia 30092. Venue is proper in this county pursuant to O.C.G.A. § 33-4-1(2) and/or (3) because Defendant maintained at the time of the events alleged herein and also currently maintains at least one or more place(s) of doing business or agent(s) in Dekalb County.

STATE COURT OF DEKALB COUNTY, GA. 6/23/2023 4:34 PM E-FILED BY: Monica Gay This Court has subject matter jurisdiction pursuant to the Georgia Constitution of 1983,
 Article VI, Section IV, Paragraph I.

STATEMENT OF FACTS

- 4. In consideration for the premiums paid to Defendant Safeco, Defendant Safeco issued its Policy No. OX5948543 to Prashant Kalavar and Shweta Kalavar (the "Policy").
- 5. The Policy insures against property damage to Plaintiffs' home located at 8030 Prestwick Circle, Duluth, Georgia 30097-6673 ("Subject Property").
- 6. On or about June 24, 2022, a hidden plumbing line in the Subject Property's basement bathroom wall cavity ruptured spewing water all over the ceiling and walls of the bathroom and flooding substantially all of the Subject Property's finished basement (the "Incident").
- 7. Plaintiffs heard "sounds" from upstairs, came downstairs to investigate, discovered the flooding, and immediately reported the loss by contacting Defendant Safeco.
- 8. Plaintiffs also took immediate action to mitigate potential damages by contacting a plumber to diagnose and repair the source of the plumbing leak as well as having a remediator immediately perform emergency water and wet material removal and move Plaintiffs' contents away from the flooding.
- 9. Defendant Safeco opened claim #049942182-01, and soon thereafter sent out a representative to investigate and estimate the loss.
- 10. Defendant Safeco agreed that the Incident was a covered loss under the Policy.
- 11. The claims adjuster, however, failed to conduct a reasonable inspection of the loss and did not exercise reasonable care or due diligence to investigate the loss.
- 12. Defendant Safeco underestimated the amount of the loss.
- 13. As a consequence, Defendant Safeco breached the Policy by refusing to make full payments to Plaintiffs for the loss, as required by the Policy.

- 14. By virtue of the insufficient payments, however, Defendant Safeco does not dispute that the Incident and related water damage and flooding are covered losses under the Policy.
- 15. Conversely, Plaintiffs consistently paid their premiums to Defendant Safeco and affirmatively discharged their duties under the Policy following the loss.
- 16. On April 17, 2023, Plaintiffs sent, and on April 19th, 2023 Defendant Safeco received, via statutory overnight delivery, a bad faith demand letter pursuant to O.C.G.A. § 33-4-6 to Defendant Safeco demanding payment within 60 days ("Plaintiffs' Bad Faith Demand").
- 17. Plaintiffs have provided documentation and reports as well as allowed Defendant to further inspect the loss, all in a good faith effort to resolve this dispute without litigation.
- 18. Despite receiving Plaintiffs' Bad Faith Demand and efforts to negotiate this dispute,

 Defendant Safeco has failed to exercise reasonable care and good faith to fully adjust and
 compensate Plaintiffs for their losses.
- 19. The water loss caused water and mold damage to the interior of the Subject Property as well as Plaintiffs' contents.
- 20. Defendant Safeco has continued to fail to pay according to the terms of the Policy.
- 21. Defendant Safeco's failure has prevented the timely remediation and restoration of the Subject Property, allowing the structure and its contents to continue to suffer the effects of the water damage and allowing the growth of toxic mold within the Subject Property, and denying Plaintiffs' the use and enjoyment of their entire basement.
- 22. Plaintiffs, as a result of Defendant Safeco's conduct, have incurred and continue to incur litigation costs, attorneys' fees, and consultant/expert fees associated with this matter.

COUNT ONE - BREACH OF CONTRACT

23. Plaintiffs reincorporate the foregoing allegations contained in this Complaint as if fully set forth herein.

- 24. Plaintiffs have performed all conditions, duties, and obligations pursuant to the Policy, including without limitation, the timely payment of premiums, timely notice of the claim, mitigation of damages, and/or Defendant Safeco has waived any and all other conditions.
- 25. Defendant Safeco is required to compensate Plaintiffs for all direct physical losses under the terms of the Policy.
- 26. Despite Plaintiffs' OCGA § 33-4-6 timely demand that Defendant Safeco pay the covered losses, Defendant Safeco has frivolously and baselessly failed and refused to exercise reasonable care to promptly and fairly adjust and pay Plaintiffs' claim under the terms of the Policy.
- 27. Defendant Safeco has failed to act in good faith and fair dealing under the terms of the Policy by refusing to properly investigate and pay Plaintiffs' claim according to the terms of the Policy.
- 28. As a result of Defendant Safeco's delay and denial of Plaintiffs' claim, Plaintiffs have sustained covered losses from direct physical damage to the insured Subject Property in an amount to be determined at trial.
- 29. Defendant Safeco's breach of the Policy has resulted in damages to Plaintiffs, and Plaintiffs are entitled to the benefit of the bargain with Defendant Safeco full compensation of the covered losses under the Policy.
- 30. As a result of Defendant Safeco's breach of the Agreement, Plaintiffs are also entitled to compensation for the foreseeable damages arising from the breach of the contract, including without limitation the mold damage to the basement's interior and contents as well as Plaintiffs' loss of use of their basement resulting from Defendant Safeco' failure to pay the costs necessary to remediate the water loss, as well.

COUNT TWO – O.C.G.A. § 33-4-6: BAD FAITH, ATTORNEY'S FEES AND LITIGATION COSTS

- 31. Plaintiffs reincorporate the foregoing allegations contained in this Complaint as if fully set forth herein.
- 32. Defendant Safeco has acted frivolously and without a reasonable basis or justification in contravention of its duty of good faith and fair dealing to achieve a proper disposition of the Plaintiffs' claim.
- 33. Defendant Safeco has not attempted in good faith to settle Plaintiffs' claim when, under all of the circumstances, it could and should have done so had it acted fairly and honestly toward the Plaintiffs and with due regard for his interests, namely, but not limited to, not attempting in good faith to effectuate prompt, fair, and equitable settlement of claims submitted in which liability has become reasonably clear (O.C.G.A. § 33-6-34(4)), knowingly misrepresenting to claimant **both** relevant facts **and** policy provisions relating to coverages at issue (O.C.G.A. § 33-6-34(1)), failing to adopt and implement procedures for the prompt investigation and settlement of Plaintiffs' claims (O.C.G.A. § 33-6-34(3)), refusing to pay Plaintiffs' claim without conducting a reasonable investigation (O.C.G.A. § 33-6-34(6)), and failing to provide a reasonable and accurate explanation of the basis for the denial when requested by Plaintiffs in writing (O.C.G.A. § 33-6-34(10)).
- 34. The above and foregoing actions of Defendant Safeco give rise to a cause of action for bad faith as Defendant Safeco has frivolously and without a reasonable basis refused to pay Plaintiffs' covered loss within sixty (60) days after Plaintiffs' timely written demand for payment according to O.C.G.A. §33-4-6.

35. As a result of Defendant Safeco's bad faith conduct and pursuant to OCGA § 33-4-6, Plaintiffs are entitled to additional exemplary damages as well as reimbursement of all

attorney's fees and litigation costs incurred in pursuing this matter.

WHEREFORE, Plaintiffs request the following relief:

A) Plaintiffs request that this case be tried with a jury;

B) Plaintiffs respectfully requests that this Court enter judgment in favor of Plaintiffs and

against Defendant Safeco in an amount to be determined at trial to compensate Plaintiffs

for their costs to (i) diagnose, repair, remediate and restore Plaintiffs' home, (ii) remediate

and/or replace Plaintiffs' water or mold-damaged personal property, and (iii) to

compensate Plaintiffs for the loss of use and enjoyment of their basement;

C) Plaintiffs request that this Court enter Judgment in favor of Plaintiffs and against Defendant

Safeco and award Plaintiffs bad faith damages in an amount of fifty percent (50%) of the

total compensatory damages awarded or \$5,000, whichever is greater, for Defendant

Safeco's bad faith refusal to pay Plaintiffs' covered loss;

D) Pursuant to O.C.G.A. §33-4-6, Plaintiffs also request that this Court enter Judgment in

favor of Plaintiffs and against Defendant Safeco and award Plaintiffs their attorneys' fees

and court costs incurred and to be incurred as a result of this dispute; and

E) Plaintiffs request that this Court award Plaintiffs any and all other relief that this Court may

deem just and proper, whether such relief sounds in law or equity.

Respectfully submitted this 23rd day of June, 2023.

CARTER JEFFRIES LLC

/s/Carson Jeffries
CARSON L. JEFFRIES, ESQ.
Georgia Bar Number 100139
cjeffries@moldfirm.com
ATTORNEY FOR PLAINTIFFS

47 Perimeter Center East, Suite 530 Atlanta, GA 30346 ph: (404) 341-6653

STATE COURT OF DEKALB COUNTY, GA. 6/23/2023 4:34 PM E-FILED BY: Monica Gay

EXHIBIT B

THE MOLD FIRM

CARTER JEFFRIES, LLC

Atlanta's Premier Dedicated Mold Law Practice

DAVID G. CARTER ATIONNEY AT LAW dcarter@moldfirm.com 47 Perimeter Center East, SUITE 530 ATLANTA, GEORGIA 30346 PHONE 404-341-6653 www.moldfirm.com

CARSON JEFFRIES
ATTORNEY AT LAW
cjeffries@moldfirm.com

April 17, 2023

<u>VIA USPS CERTIFIED FIRST CLASS MAIL, RETURN RECEIPT REQUESTED</u> <u>& EMAIL WHERE INDICATED</u>

Katie Kalinowski
Claim Professional
Safeco Insurance Company of Indiana
PO Box 5014
Scranton, PA. 18505-5014
Katie.kalinowski@libertymutual.com

The Safeco Insurance Company of Indiana c/o Corporation Service Company, R/A/F 2 Sun Court, Suite 400 Peachtree Corners, GA. 30092

Damon P. Hart, Secretary Safeco Insurance Company of Indiana 175 Berkeley Street Boston, MA. 02116

Karen Karabinos
Kevin P. Kelly
Chartwell Law
3200 Cobb Galleria Parkway, Suite 250
Atlanta, GA. 30339
kkarabinos@chartwelllaw.com
kkelly@chartwelllaw.com
Attorneys for Safeco Insurance Company of Indiana

Insurer's DOL¹: June 24, 2022

Insurer: Safeco Insurance Company of Indiana
Your Insured: Prashant Kalavar & Shweta Manjeshwa

Policy No.: OX5948543 Claim No: 049942182-01

Subject Property: 8030 Prestwick Circle, Duluth, GA. 30097-6673

RE: BAD-FAITH DEMAND FOR IMMEDIATE PAYMENT UNDER O.C.G.A. § 33-4-6

¹ This "date of loss" indicated herein is provided to ensure consistency with Insurer's internal identification and records as to this Claim and is not intended to reflect or otherwise limit Insured's position or right to contest the date of loss in any subsequent legal or administrative proceeding.

Dear Ms. Karabinos, Ms. Kalinowski, Mr. Kelly, and Mr. Hart:

My firm, Carter Jeffries LLC, and I have the pleasure of representing your insured, Prashant Kalavar & Shweta Manjeshwa, (collectively referred to as my "Clients" or the "Insured") with respect to the water loss and related damages affecting their home located at 8030 Prestwick Circle, Duluth, GA. 30097-6673 as well as their claims against Safeco Insurance Company of Indiana ("Safeco" or "Insurer") for its bad faith failure and refusal to promptly adjust and make payment to them for their covered losses. Accordingly, please forward all future communications to my attention.

Pursuant to O.C.G.A. § 24-4-408, statements made with a view toward compromise are inadmissible at trial. This Georgia law was enacted to encourage the settlement of controversies by permitting parties to discuss their cases candidly with the assurance that admissions and proposals for compromise made in the course of the good-faith settlement negotiations may not be used against them and any subsequent lawsuit. Benn v. McBride, 140 Ga.App. 698 (1976). This entire letter is being submitted with a view toward compromise of this claim. If you do not agree that everything that follows is inadmissible during the litigation of this matter, please stop reading and immediately destroy this letter and its attachments and immediately notify us of your refusal to review our attempt to compromise this claim.

OFFER OF COMPROMISE

This notice and demand is directed to Safeco as the insurer for my Clients' home located at 8030 Prestwick Circle, Duluth, GA. 30097-6673 ("Subject Property"). This letter is written to submit my Clients' demand for compromise, made pursuant to the Insured's policy #OX5948543 with Safeco Insurance Company of Indiana (the "Policy"). It is undisputed that on or about June 24, 2022, a toilet plumbing line in Insured's basement ruptured, spraying water all over the bathroom and flooding the basement area. It is equally undisputed that my Clients immediately reported the loss to Safeco and took measures to protect and preserve the property by contacting third-party remediator, Servpro, to conduct emergency water extraction and removal as well as contacted E&L Service, a plumber, to fix the plumbing line as well as to identify the source of the loss. In addition to damage to the plumbing and dwelling, the water loss resulted in mold and/or water damage to the Subject Property's HVAC system, electrical system, and contents.

Subsequently, Safeco sent a field adjuster to investigate and adjust the loss. The Insureds cooperated in Safeco's efforts to adjust the loss by providing all documentation as requested by Insurer, allowing Insurer to inspect the evidence as often as requested, and otherwise complying with all their duties pursuant to the Policy. After reducing the estimated loss by recoverable depreciation and the deductible, Safeco issued approximately \$46,504.20 in payments, including for costs to restore and repair the dwelling, pack-out contents, repair the HVAC system, as well as the Plumber's bill for accessing the plumbing and sourcing the loss.

The insured disagreed with Safeco's valuation of the loss and demanded appraisal on or about August 8, 2022, appointing Bruce Fredrics as their appraiser. Subsequently, the Parties' Appraisers could not agree on an umpire, and Safeco, via counsel Ms. Karabinos and Mr. Kelly ("Safeco Counsel"), requested another inspection of the Subject Property, due to Mr. Fredrics' new estimate for the Dwelling equaling \$192,294.40.

As a result of these delays in the adjustment and appraisal process, Prashant and Shweta have been (i) unable to complete the remediation and restoration of their basement and (ii) compelled to preserve the basement in its demolished state while Safeco lacksadaisically reviews the loss. As a result, their family has lost the use of their finished basement for almost a year: a room in their home where they previously congregated with their children to engage as a family and spend time together. Further, the delays have led to the growth of additional mold contamination in the basement, creating a hazard for the family.

Subsequently, Clients retained undersigned law firm, engaged a new expert estimator, Scott Henderson of Independent Estimators, and agreed to Safeco's request, via their counsel, for a reinspection of the Subject Property and the alleged losses and damages. On or about January 25, 2023, the Parties' representatives met at the Subject Property for the comprehensive reinspection. Prashant Kalavar, Undersigned counsel for the Insured's, Scott Henderson of Independent Estimates, Frank Davis of Haight Davis & Associates, and Richard Johnson of Air Allergen & Mold Testing attended on behalf of the Insureds. Meanwhile, Brandon Love of Liberty Mutual, Richard Grimshaw of Donan, and John Smith of Profire attended on behalf of Safeco. The Insured's representatives conducted a walk-thru of the Subject Property, explained their testing/inspection of the Subject Property, and answered Safeco's representatives' questions. Subsequently, Safeco's representatives conducted their own testing and/or visual inspection of the basement, the loss and any water and/or mold related damages or losses.

At the conclusion of the inspection, the Parties' representatives had a productive discussion about reaching an amicable resolution in this matter. Pursuant to said discussion, the Insured's representatives agreed to submit Mr. Henderson's estimate of the loss (Appendix A), Mr. Johnson's lab report as well as his basic recommended mold remediation guidelines arising from his environmental sampling of the Subject Property (Attachment A), and a new demand for compromise to Safeco and its representatives for review and acceptance or counteroffer. Consequently, Insured's itemized losses and demand for compromise are as follows:

- Costs to repair and restore the dwelling: \$72, 813.30 (Independent Estimates Report: Appendix A: p. 16), which estimate includes the following bid items:
 - O Costs to Diagnose Source of Loss: \$4,380.00 (Independent Estimates line item 161; E&L Service Invoice: Appendix A: p. 21)
 - o Costs to Repair Source of Loss: \$3,524.00 (Independent Estimates line item

- 163; E&L Service Invoice: Appendix A: p. 22)
- O Costs to Repair damaged HVAC: \$559.50 (Independent Estimates line item 152; Casteel Invoice: Appendix A: p.gs 23-24)
- O Costs to repair electrical wiring submerged and damaged by flooding: \$5,500 (Independent Estimates line item 164; Meso Potamia Invoice: Appendix A: p.25)
- O Costs to certify structural integrity of flood area: \$1,780.00 (Independent Estimates line item 158; Haight Davis & Associates Invoice: Appendix A: pgs. 26-27)
- Costs to test and develop mold remediation protocol for remediation of mold contamination: \$2,086.00 (Independent Estimates line item 159; Air Allergen & Mold Testing Invoice: Appendix A: p. 28)
- Costs to remediate and/or replace contents: \$87,062.50 (Independent Estimate Report: Appendix A: p. 17), which also includes Insured's itemized spreadsheet of contents (Appendix A: pgs. 19-20)
- Minus Set-off for Prior Payments: (\$46,504.20) (Safeco Prior Payments: Appendix A: pgs. 30-33)

Subtotal for Difference in Covered Losses after Deducting Set-off: \$113,371.60

- Litigation Costs: \$1,437.50 (Independent Estimates Invoice: Appendix A: p.29)
- Attorney's Fees to date: \$39,680.06

Total Claim: \$154,489.16

*Please be advised that this loss itemization, lab report, basic mold remediation guidelines and expert estimate are being offered for the purpose of compromise and settlement only and shall not be used for any evidentiary purpose and shall remain confidential if litigation becomes necessary.

In a last-ditch effort to avoid needless litigation, my Clients hereby demand Safeco make payment to them in the amount of \$154, 489.16 in full and final settlement and compromise of all contract, bad faith and related claims against Safeco, including but not limited to those for the damages as set forth in the above paragraph and in Appendix A, arising from or relating to the June 24, 2022 water loss or their insurance policy with Safeco. Please note that in good faith, my Clients' demanded amount does not include any amounts for the loss of their basement or punitive damages: claims they will pursue if forced to file a formal lawsuit with respect to their claims. Please also note that additional delays will only result in increased litigation costs and attorney's fees.

Please be further advised that Insureds are making this demand to Safeco pursuant to O.C.G.A. § 33-4-6, and the sum demanded must be **RECEIVED**² no later than 60 days from the date of receipt, which shall be conclusively established by the delivery return receipt or date provided to us by the United States Postal Service's tracking and delivery data. IF THE WITHIN AND FOREGOING DEMAND FUNDS ARE NOT RECEIVED BY 5:00 P.M. EST ON THE 60TH DAY AFTER RECEIPT OF THIS DEMAND, ALL OFFERS OF SETTLEMENT AND COMPROMISE WILL BE WITHDRAWN, A LAWSUIT INITIATED AGAINST SAFECO, AND BADFAITH PENALTIES WILL BE SOUGHT AGAINST SAFECO AS WELL AS ALL OTHER REMEDIES AVAILABLE UNDER THE LAW.

Please be aware that this demand for policy limits in compromise of this claim is not negotiable and that <u>ALL</u> conditions of the demand must be met by the specified time limit. If any condition is not met, or if any additional condition is imposed by Insurers, including but not limited to conditions of indemnification or the waiver of any rights or claims not specified herein, this demand for settlement and compromise will be withdrawn, and we will seek bad-faith penalties against Safeco. Please be aware that, under Georgia law, this demand must be accepted unequivocally and without variance of any sort and that a purported acceptance of this demand that imposes conditions beyond those contained in this demand will be construed as a counteroffer to my Clients' demand. *See Frickey v. Jones*, 280 Ga. 573, 630 S.E. 2d 374 (2006).

I apologize for the tone of this demand letter; however, the requirements of O.C.G.A. § 33-4-6 make such directness advisable. Should you have any questions regarding this demand, please do not hesitate to contact me at (404) 341-6653. Of course, this letter is written in furtherance of settlement, and nothing contained herein shall be deemed admissible except to enforce a claim for bad-faith failure to settle this claim.

Yours very truly,

CARTER JEFFRIES LL

Carson Jeffries, Esq.

Encl.:

-Appendix A: Estimator's Report and attached financial support

-Attachment A: Lab Report and Basic Mold Remediation Guidelines

² Settlement funds must be paid by Cashier's Check, Certified Bank Check, or a valid check (<u>not draft</u>) issued by your insurance company to "Carter Jeffries LLC" (Tax ID 81-5428377), and the check must be RECEIVED in my office no later than 5:00 p.m. EST, 60 days from the date of receipt, which shall be conclusively established by the delivery return receipt and date provided to us by the United States Postal Service.

Page 19 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar

Company:

1543 Lilburn Stone-Mountain Road, Suite 200

Date Received 1/28/2023

Address: 8030 Preswick Circle, Duluth,

Stone Mountain, GA 30087 (678) 723-5848 Analyzed by S. SporeCyte

GA 30097

Phone (770) 938-4861 Fax

Date Ammended

Project: 8030 Preswick Circle

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002

Report Number 35138

Location		Outside			Bathroon	n	wall	cavity near b	ath
AAMT Nbr		35138-001			35138-002	2		35138-003	
Spore Trap Serial #		02537572			02528965	5		02520484	
Sample/Cassette Type	Aller	rgenco D Posi	-Track	Aller	genco D Pos	si-Track	Allerg	enco D Posi-Tı	ack
Liters Collected		75 L			75 L			75 L	
Humid/Temp		46 / 66			54 / 66			55 / 66	
Particulate	Carbo	on	Soil	Carbo	n	Soil	Carbo	on	Soil
	Talc/Talc	Like		Talc/Talc	Like I	nsectPart	Insecti	Part	
Fibrous Particulate	unident F	ibers		unident F	ibers	Insulation	unident F	ibers In	sulation
Skin Fragments		16			1473			720	
Background / Cubic Meter		66,360			805,267			424,600	
Hyphae / m ³		13			320			267	
Pollen / m ³		173							
Spore Name	Raw Ct	Spore / m ³	% of Total	Raw Ct	Spore / m	³ % of Total	Raw Ct	Spore / m	3 %Tota
Predominately Outdoor	Hun ot	Operer III	70 01 10 00.		орого / пл	70 OI 1 Otta		ороло / пл	701012
Alternaria									
Arthrinium	1	13	2.5	1	13	1.0			
Ascospores	17	227	43.7	8	107	8.3	4	53	3.1
Basidiospores	10	133	25.6	7	93	7.2	7	93	5.5
Bipolaris									
Curvularia									
Epicoccum				1	13	1.0			
Nigrospora									
Periconia/Myxomycete									
Pithomyces									
Spegazzinia									
Torula									
Misc	6	80	15.4	35	467	36.1	21	280	16.5
Indoor - Outdoor									
Aspergillus/Penicillium	2	27	5.2	37	493	38.1	90	1,200	70.9
Cladosporium	3	40	7.7	8	107	8.3	5	67	4.0
·									
Water Related									
Chaetomium									
Stachybotrys									
Trichoderma									
Total Spores	20	520	100	07	4.202	100	427	4.600	100
rotai Spores	39	520	100	97	1,293	100	127	1,693	100

Limit of Detection @600x Limit of Detection @300x 44 13 44 13 44 13

Please see attached sheet for additional information and important notes.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Page 20 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar Address: 8030 Preswick Circle, Duluth,

Company:

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Date Received 1/28/2023 Analyzed by S. SporeCyte

GA 30097

Phone (770) 938-4861 Fax

(678) 723-5848

Date Ammended

Project: 8030 Preswick Circle

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002

Report Number 35138

Skin Fragments 16	Location		Outside			Wine Cel	ler	N	lear bar s	ink
Allergenco D Posi-Track Liters Collected T5 L T5 L	AAMT Nbr		35138-001						35138-00	5
Liters Collected 75 L 75 L 75 L 54 / 66	Spore Trap Serial #		02537572			02536420	0		0253546	0
Humid/Temp	Sample/Cassette Type	Allei	rgenco D Pos	-Track	Aller	genco D Po	si-Track	Allerg	enco D Po	si-Track
Particulate	Liters Collected		75 L			75 L			75 L	
Talc/Talc Like	Humid/Temp		46 / 66			54 / 65			54 / 66	
Skin Fragments	Particulate	Carbo	on	Soil	Carbo	n	Soil	Carb	on	Soil
Skin Fragments		Talc/Talc	Like		Talc/Talc	Like	InsectPart			
Skin Fragments 16	Fibrous Particulate	unident F	ibers		unident F	ibers	Insulation	unident l	ibers	Insulation
Background / Cubic Meter 66,360 696,987 253	Tibrodo Farilodiato									
Background / Cubic Meter 66,360 696,987 253	Skin Fragments		16			1052			855	
Hyphae / m 3										
Pollen / m 3										
Spore Name						200			200	
Predominately Outdoor		D 01		0/ of Tata!	Da 01	0	3 0/ -/	Pau Ct	C	/ 2 -:-
Alternaria Arthrinium Ascospores 17 227 43.7 3 40 3.8 3 40 7. Basidiospores 10 133 25.6 3 40 3.8 3 40 7. Bipolaris Curvularia Epicoccum Nigrospora Periconia/Myxomycete Pithomyces Spegazzinia Torula Misc 6 80 15.4 26 347 32.6 22 293 57 Indoor - Outdoor Aspergillus/Penicillium 2 27 5.2 28 373 35.0 4 53 15 67 Water Related Chaetomium Stachybotrys		Raw Ct	Spore / m 3	% of Total	Raw Ct	Spore / m	of Total	Raw Ct	Spore	/ m ³ %Tota
Arthrinium										
Ascospores		4	10	0.5		4.0	1.0			
Basidiospores 10 133 25.6 3 40 3.8 3 40 7.								_		
Bipolaris Curvularia Epicoccum										-
Curvularia Epicoccum		10	133	25.6	3	40	3.8	3	4	0 7.9
Epicoccum										
Nigrospora										
Periconia/Myxomycete Pithomyces Spegazzinia Torula Misc 6 80 15.4 26 347 32.6 22 293 51 Indoor - Outdoor Aspergillus/Penicillium 2 27 5.2 28 373 35.0 4 53 5 Cladosporium 3 40 7.7 19 253 23.7 5 67 5 Water Related Chaetomium Stachybotrys Chaetomium Stachybotrys Assertion of the control	Epicoccum									
Pithomyces Spegazzinia Torula 1 Misc 6 80 15.4 26 347 32.6 22 293 50 Indoor - Outdoor 2 27 5.2 28 373 35.0 4 53 5 Cladosporium 3 40 7.7 19 253 23.7 5 67 67 Water Related Chaetomium Stachybotrys Chaetomium Stachybotrys 1 </td <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>1</td> <td>1</td> <td>3 2.6</td>								1	1	3 2.6
Spegazzinia Torula Spegazzinia Spega										
Torula Misc 6 80 15.4 26 347 32.6 22 293 57 Indoor - Outdoor Aspergillus/Penicillium 2 27 5.2 28 373 35.0 4 53 Cladosporium 3 40 7.7 19 253 23.7 5 67 Water Related Chaetomium Stachybotrys										
Misc 6 80 15.4 26 347 32.6 22 293 50 Indoor - Outdoor Aspergillus/Penicillium 2 27 5.2 28 373 35.0 4 53 5 Cladosporium 3 40 7.7 19 253 23.7 5 67 67 Water Related Chaetomium Stachybotrys Stachybotrys 8 8 8 8 8 8 9										
Indoor - Outdoor	Torula									
Indoor - Outdoor										
Indoor - Outdoor										
Indoor - Outdoor										
Indoor - Outdoor										
Aspergillus/Penicillium 2 27 5.2 28 373 35.0 4 53 Cladosporium 3 40 7.7 19 253 23.7 5 67 Water Related Chaetomium Stachybotrys	Misc	6	80	15.4	26	347	32.6	22	29	<mark>57.9</mark>
Cladosporium 3 40 7.7 19 253 23.7 5 67 67 Water Related Chaetomium Stachybotrys 5 67	Indoor - Outdoor									
Water Related Chaetomium Stachybotrys	Aspergillus/Penicillium	2	27	5.2	28	373	35.0	4	5	3 10.5
Chaetomium Stachybotrys	Cladosporium	3	40	7.7	19	253	23.7	5	6	7 13.2
Chaetomium Stachybotrys	·									
Chaetomium Stachybotrys	Water Related									
Stachybotrys										
	Hidiodelilla									
Total Spores 39 520 100 80 1,066 100 38 506	Total Spores	30	520	100	90	1.066	100	20	F	6 100

Limit of Detection @600x Limit of Detection @300x 44 13 44 13 44

Please see attached sheet for additional information and important notes.

13

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

Page 21 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar Address: 8030 Preswick Circle, Duluth,

Company:

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Date Received 1/28/2023 Analyzed by S. SporeCyte

GA 30097

Phone (770) 938-4861 Fax

Date Ammended

Project: 8030 Preswick Circle

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002

(678) 723-5848

Report Number 35138

Ascospores	Location		Outside		Ma	in room c	enter	Ro	om 1 off	main		
Sample/Cassette Type Liters Collected To L To L	AAMT Nbr		35138-00°	1		35138-006			35138-007			
Liters Collected	Spore Trap Serial #		02537572)		02529733	3		0252029	92		
Humid/Temp	Sample/Cassette Type	Aller	genco D Pos	si-Track	Aller	genco D Po	si-Track	Allerg	enco D Po	osi-Tra	ck	
Particulate	Liters Collected							_	75 L			
Talc/Talc Like	Humid/Temp		46 / 66			54 / 66			53 / 66			
Skin Fragments	Particulate	Carbo	n	Soil	Carbo	n	Soil	Carbo	on	5	Soil	
Skin Fragments		Talc/Talc	Like		Talc/Talc	Like	InsectPart	Talc/Talc	Like	Inse	ectPart	
Skin Fragments	Fibrous Particulate	unident F	ibers		unident F	ibers	Insulation	unident F	ibers	Insu	ulation	
Background / Cubic Meter Hyphae / m 3	r ibrodo r di iliodiato											
Background / Cubic Meter Hyphae / m 3	Skin Fragments		16			1323			871			
Hyphae / m 3										3		
Pollen / m 3												
Spore Name	1.1											
Predominately Outdoor		Paw Ct		3 % of Total	Raw Ct	Spore / m	3 % of Total	Raw Ct	Snore	/m 3	3 0/ Tatal	
Alternaria		Naw Ct	Spore / III	3 /6 OI TOTAL	Naw Ct	Spore / III	78 OI 10tai	itaw ot	Spore	7 111 -	% i otai	
Arthrinium 1 13 2.5 3 40 2.6 1 13 6 Ascospores 17 227 43.7 3 40 2.6 2 27 1 Basidiospores 10 133 25.6 16 213 14.0 1 13 6 Bipolaris 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 0.9 1 13 1 13 13 1 13 13 1 13 13 1 1 13 1 13 1 1 13 1 1												
Ascospores		1	13	2.5	3	40	2.6	1	1	3	6.5	
Basidiospores 10						_					13.6	
Bipolaris Curvularia 1	-										6.5	
Curvularia		10	100	20.0	10	210	11.0	•			0.0	
Epicoccum	•				1	13	0.9					
Nigrospora Periconia/Myxomycete Pithomyces 1												
Periconia/Myxomycete	•				•	10	0.0					
Pithomyces 1 13 0.9												
Spegazzinia					1	13	0.9					
Torula 2 27 1.8												
Indoor - Outdoor					2	27	1.8					
Indoor - Outdoor												
Indoor - Outdoor												
Indoor - Outdoor												
Indoor - Outdoor												
Aspergillus/Penicillium 2 27 5.2 31 413 27.2 3 40 Cladosporium 3 40 7.7 18 240 15.8 1 13 Water Related Chaetomium Stachybotrys Stachybotrys 5 5 40 10	Misc	6	80	15.4	38	507	33.4	7	S	93	46.7	
Cladosporium 3 40 7.7 18 240 15.8 1 13	Indoor - Outdoor											
Cladosporium 3 40 7.7 18 240 15.8 1 13	Aspergillus/Penicillium	2	27	5.2	31	413	27.2	3	4	10	20.1	
Water Related Chaetomium Stachybotrys		3	40	7.7	18	240	15.8	1	1	3	6.5	
Chaetomium Stachybotrys	·											
Chaetomium Stachybotrys	Water Related											
Stachybotrys												
Total Spores 39 520 100 114 1,519 100 15 199	Total Spores	39	520	100	114	1 510	100	15	1	99	100	

Limit of Detection @600x Limit of Detection @300x 44 13 44 13 44

Please see attached sheet for additional information and important notes.

13

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

Page 22 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar Address: 8030 Preswick Circle, Duluth,

Company:

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Date Received 1/28/2023 Analyzed by S. SporeCyte

GA 30097

Phone (770) 938-4861 Fax

Date Ammended

Project: 8030 Preswick Circle

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002

(678) 723-5848

Report Number 35138

Location		Outsi	de		Room 2 w	/TV	Ro	om 3 sto	orage	
AAMT Nbr		35138-0	001		35138-008			35138-00)9	
Spore Trap Serial #		025375	72		02530656			02528389		
Sample/Cassette Type	Aller	genco D F	Posi-Track	Aller	genco D Po	si-Track	Allerg	enco D Po	osi-Track	
Liters Collected		75 L			75 L			75 L		
Humid/Temp		46 / 6	6		51 / 65			51 / 66		
Particulate	Carbo	n	Soil	Carbo	on	Soil	Carbo	on	Soi	il
	Talc/Talc	Like		Talc/Talc	Like	InsectPart	Talc/Talc	c Like		
Fibrous Particulate	unident F	ibers		unident F	ibers	Insulation	unident F	ibers	Insulat	tion
Skin Fragments		16			500			556		
Background / Cubic Meter		66,36	0		603,373			692,173	3	
Hyphae / m ⁻³		13			253			293		
Pollen / m ³		173								
Spore Name	Raw Ct	Spore / ı	n ³ % of Total	Raw Ct	Spore / m	³ % of Total	Raw Ct	Spore	/ m 3 %	%Total
Predominately Outdoor		ороло,	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		<u> </u>	70 01 1000		<u> </u>	, ,	/UTOLGI
Alternaria										
Arthrinium	1	13	2.5							
Ascospores	17	227	43.7	1	13	1.8				
Basidiospores	10	133	25.6	4	53	7.2	1	1	3 2	2.2
Bipolaris				1	13	1.8				
Curvularia										
Epicoccum							2	2	27	4.5
Nigrospora										
Periconia/Myxomycete										
Pithomyces										
Spegazzinia										
Torula				1	13	1.8				
Misc	6	80	15.4	28	373	51.0	28	37	<mark>73</mark>	62.3
Indoor - Outdoor										
Aspergillus/Penicillium	2	27	5.2	12	160	21.9	4	5	53	8.8
Cladosporium	3	40	7.7	6	80	10.9	10	1:	33	22.2
Water Related										
Chaetomium										
Stachybotrys				2	27	3.7				
Trichoderma										
Total Spores	39	520	100	55	732	100	45	59	99	100

Limit of Detection @600x Limit of Detection @300x 44 13 44 13 44

Please see attached sheet for additional information and important notes.

13

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

Page 23 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar

Company:

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Date Received 1/28/2023

GA 30097

Address: 8030 Preswick Circle, Duluth,

Phone (770) 938-4861 Fax

Analyzed by S. SporeCyte

(678) 723-5848 **Date Ammended**

Project: 8030 Preswick Circle Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002 Report Number 35138

Location		Outside			Utility Roo	m	Maii	n Rm Eas	st Wall	
AAMT Nbr		35138-001			35138-010			35138-01	1	
Spore Trap Serial #		02537572			02529157			0253834	.0	
Sample/Cassette Type	Aller	genco D Posi	-Track	Allergenco D Posi-Track			Allergenco D Posi-Track			
Liters Collected		75 L		75 L			75 L			
Humid/Temp		46 / 66		46 / 68				54 / 66		
Particulate	Carbo		Soil	Carbo		Soil	Carb		Soil	
, artioulate	Talc/Talc		30.1	Talc/Talc		nsectPart	Talc/Tal		InsectPart	
Elbarra Destinadata	unident F			unident F		nsulation	unident l		Insulation	
Fibrous Particulate	unidenti	ibers		unidenti	inei2 II	isulation	unidenti	ibeis	IIISUIAUOII	
Ol: E		4.0			004			122		
Skin Fragments		16			661					
Background / Cubic Meter		66,360			885,507			418,240)	
Hyphae / m ³		13			347			27		
Pollen / m ³		173			13	_				
Spore Name	Raw Ct	Spore / m 3	% of Total	Raw Ct	Spore / m	³ % of Total	Raw Ct	Spore	/ m 3 %Tot	
Predominately Outdoor										
Alternaria				1	13	0.7				
Arthrinium	1	13	2.5	2	27	1.5				
Ascospores	17	227	43.7	2	27	1.5				
Basidiospores	10	133	25.6	49	653	35.2				
Bipolaris										
Curvularia										
Epicoccum										
Nigrospora										
Periconia/Myxomycete										
Pithomyces				1	13	0.7				
Spegazzinia										
Torula										
Misc	6	80	15.4	31	413	22.3	4	5	19.9	
Indoor - Outdoor										
Aspergillus/Penicillium	2	27	5.2	30	400	21.6	15	20	75.2	
Cladosporium	3	40	7.7	23	307	16.6	1	1	3 4.9	
Water Related										
Chaetomium										
Stachybotrys										
Trichoderma										
Total Spores	39	520	100	139	1,853	100	20	20	66 100	

Limit of Detection @600x Limit of Detection @300x 44 13 44 13 44

Please see attached sheet for additional information and important notes.

13

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

(678) 723-5848

Page 24 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar Address: 8030 Preswick Circle, Duluth,

Company:

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Date Received 1/28/2023 Analyzed by S. SporeCyte

GA 30097

Phone (770) 938-4861 Fax

Date Ammended

Project: 8030 Preswick Circle

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-001

Report Number 35138

Location		Outside		Ma	in Rm So	Wall			
AAMT Nbr		35138-001			35138-01				
Spore Trap Serial #		02537572			0252858				
Sample/Cassette Type	Aller	genco D Pos	i-Track	Aller	genco D Po				
Liters Collected	Allor	75 L	riack	Allorg	75 L	31 TIAON			
Humid/Temp		46 / 66			55 / 66				
Particulate	Carbo		Soil	Carbo		Soil			
1 articulate	Talc/Talc		3011	Talc/Talc		InsectPart			
Fibrous Particulate	unident F	ibers		unident Fi	bers	Insulation			
Skin Fragments		16			266				
Background / Cubic Meter		66,360			605,693				
Hyphae / m ³		13			53				
Pollen / m ³		173			13				
Spore Name	Raw Ct	Spore / m 3	% of Total	Raw Ct	Spore / m	³ % of Total	Raw Ct	Spore / m	³ %Total
Predominately Outdoor									
Alternaria									
Arthrinium	1	13	2.5						
Ascospores	17	227	43.7	1	13	2.0			
Basidiospores	10	133	25.6	4	53	8.3			
Bipolaris									
Curvularia									
Epicoccum									
Nigrospora									
Periconia/Myxomycete									
Pithomyces									
Spegazzinia									
Torula									
Misc	6	80	15.4	5	67	10.5			
Indoor - Outdoor									
Aspergillus/Penicillium	2	27	5.2	28	373	58.4			
Cladosporium	3	40	7.7	10	133	20.8			
						20.0			
Water Related									
Chaetomium									
Stachybotrys									
Trichoderma									
Hichodelina									
Total Spores	39	520	100	48	639	100			

Limit of Detection @600x Limit of Detection @300x 44 13 44 13

Please see attached sheet for additional information and important notes.

Top 3 organisms =

Richard Johnson, Laboratory Director

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

AIHA Culture Proficiency Analytical Testing Participant # 199873 PJLA ISO/IEC 17025:2017 Environmental Accreditation # 91033

1543 Lilburn Stone-Mountain Road, Suite 200

Page 25 of 81 Report Date 02/06/2023

Date Received 1/28/2023

Date Amended

Analyzed by S. SporeCyte

Address: 8030 Preswick Circle, Duluth,

Company:

Attention: Prashant Kalavar

Project: 8030 Preswick Circle

GA 30097

Stone Mountain, GA 30087 Phone (770) 938-4861 Fax (678) 723-5848

Report Number 35138

Spore Trap Comments

Linear Spore Trap Analysis by SOP LAB-SOP-SPT-002

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Background is a combination of debris, skin and fibers.

* Water Related refers to organisms that are commonly found in areas of high water activity. This can be in the form of high Relative Humidity (RH), meaning consistently above 50%.

**Spore Total symbols are; ND is None Detected, DS is Defective Slide and NT is No Trace

Richard Johnson, Laboratory Director

Schard Johnson

LAB-FRM-ITS-003

Case 1:23-mi-99999-UNA ATTACHMENT A 07/25/23 Page 26 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar

Company:

1543 Lilburn Stone-Mountain Road, Suite 200

Stone Mountain, GA 30087

Phone (770) 938-4861 Fax (678) 723-5848

Date Received 1/28/2023 Analyzed by S. SporeCyte

Job Number 35138

DateAmended

Project 8030 Preswick Circle

GA 30097

Address: 8030 Preswick Circle Duluth,

Report Number 35138

Direct Exam Microscopic Analysis by SOP LAB-SOP-DIR-001

Location	Main rm base plate		Location	Bar foot supports	
AAMT Nbr	35138-013		AAMT Nbr	35138-014	
Sample ID	SW 1		Sample ID	SW 2	
SampleType	Swab		SampleType	Swab	
Background 1	Dust		Background 1	Dust	
Humidity/Temp	/		Humidity/Temp	/	
Dustmites	Absent		Dustmites	Absent	
Hyphae	Moderate		Hyphae	Moderate	
Spore Type	Amount I	FS	Spore Type	Amount	FS
Aspergillus / Penicillium	> 90 %	✓	Aspergillus / Penicillium	> 90 %	✓

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Qualitative analysis

Predominant = major spore type on slide. More than one spore type can be Predominant.

Moderate = < 50% of slide.

Rare = < 10% of slide.

FS = Fruiting structures present. Indicates fungi is currently growing.

Richard Johnson, Laboratory Director

LAB-FRM-ITS-004

Case 1:23-mi-99999-UNA ATTACHMENT A 07/25/23 Page 27 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar 1543 L

1543 Lilburn Stone-Mountain Road, Suite 200

Stone Mountain, GA 30087

Phone (770) 938-4861 Fax (678) 723-5848

DateAmended

Date Received 1/28/2023

Job Number 35138

Analyzed by S. SporeCyte

Project 8030 Preswick Circle

GA 30097

Address: 8030 Preswick Circle Duluth,

Company:

Report Number 35138

Direct Exam Microscopic Analysis by SOP LAB-SOP-DIR-001

Location	Bathroom Cabinet		Location	Media room sofa	
AAMT Nbr	35138-015		AAMT Nbr	35138-016	
Sample ID	SW 3		Sample ID	SW 4	
SampleType	Swab		SampleType	Swab	
Background 1	Dust		Background 1	Dust	
Humidity/Temp	/		Humidity/Temp	1	
Dustmites	Absent		Dustmites	Absent	
Hyphae	Rare		Hyphae	Moderate	
Spore Type	Amount	FS	Spore Type	Amount	FS
Aspergillus / Penicillium	Rare		Basidiospores	Moderate	
			Aspergillus / Penicillium	Moderate	

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Qualitative analysis

Predominant = major spore type on slide. More than one spore type can be Predominant.

Moderate = < 50% of slide.

Rare = < 10% of slide.

FS = Fruiting structures present. Indicates fungi is currently growing.

Richard Johnson, Laboratory Director

LAB-FRM-ITS-004

Case 1:23-mi-99999-UNA ATTACHMENT A 07/25/23 Page 28 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar

Company:

1543 Lilburn Stone-Mountain Road, Suite 200

Stone Mountain, GA 30087

GA 30097

Phone (770) 938-4861 Fax (678) 723-5848

Analyzed by S. SporeCyte

Date Received 1/28/2023

Job Number 35138

DateAmended

Project 8030 Preswick Circle

Address: 8030 Preswick Circle Duluth,

Report Number 35138

Direct Exam Microscopic Analysis by SOP LAB-SOP-DIR-001

Location	Furnature in Rm 1		Location	Front surface of bar	
AAMT Nbr	35138-017		AAMT Nbr	35138-018	
Sample ID	SW 5		Sample ID	SW 6	
SampleType	Swab		SampleType	Swab	
Background 1	Dust		Background 1	Dust	
Humidity/Temp	/		Humidity/Temp	/	
Dustmites	Absent		Dustmites	Absent	
Hyphae	Moderate		Hyphae	Moderate	
Spore Type	Amount	FS	Spore Type	Amount	FS
Aspergillus / Penicillium	> 90 %	✓	Aspergillus / Penicillium	Predominant	
			Curvularia	Rare	

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Qualitative analysis

Predominant = major spore type on slide. More than one spore type can be Predominant.

Moderate = < 50% of slide.

Rare = < 10% of slide.

FS = Fruiting structures present. Indicates fungi is currently growing.

Richard Johnson, Laboratory Director

LAB-FRM-ITS-004

Case 1:23-mi-99999-UNA ATTACHMENT A 07/25/23 Page 29 of 81 Report Date 02/06/2023

Attention: Prashant Kalavar

GA 30097

Address: 8030 Preswick Circle Duluth,

1543 Lilburn Stone-Mountain Road, Suite 200

Stone Mountain, GA 30087

Phone (770) 938-4861 Fax (678) 723-5848

Date Received 1/28/2023

Analyzed by S. SporeCyte

Job Number 35138

DateAmended

Project 8030 Preswick Circle

Company:

Report Number 35138

Direct Exam Microscopic Analysis by SOP LAB-SOP-DIR-001

Location	Ping Pong Table Le	eg	Location	Wine rack	
AAMT Nbr	35138-019		AAMT Nbr	35138-020	
Sample ID	SW 7		Sample ID	SW 8	
SampleType	Swab		SampleType	Swab	
Background 1	Dust		Background 1	Dust	
Humidity/Temp	/		Humidity/Temp	/	
Dustmites	Absent		Dustmites	Absent	
Hyphae	Moderate		Hyphae	Moderate	
Spore Type	Amount	FS	Spore Type	Amount	FS
Aspergillus / Penicillium	> 90 %	✓	Aspergillus / Penicillium	> 90 %	•

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

Qualitative analysis

Predominant = major spore type on slide. More than one spore type can be Predominant.

Moderate = < 50% of slide.

Rare = < 10% of slide.

FS = Fruiting structures present. Indicates fungi is currently growing.

Richard Johnson, Laboratory Director

LAB-FRM-ITS-004

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Company:

Attention: Prashant Kalavar

Address: 8030 Preswick Circle Duluth,

GA 30097

1543 Lilburn Stone-Mountain Road, Suite 200 Stone Mountain, GA 30087

Phone (770) 938-4861 Fax (678) 723-5848

> Report Number 35138

Project: 8030 Preswick Circle Culture Plate Analysis of Bulk, Dust, Swab

for Fungi by SOP LAB-SOP-DST-002

Report Date 02/06/2023 Date Received 1/28/2023 Analyzed by M. Khan

Job Number 35138

Date Amended

Location		Media room carpet				Storage Room carpet						
AAM	AAMT Nbr		35138-021				35138-022					
Sam	Sample ID		CD 2				CD 3					
Samp	SampleType		Dust				Dust					
Metrics	/Measure	0.3247		gram		0.1784			gran	gram		
Limit of Detection	Dilution	Raw Count	Identification		CFU/	Limit of Detection	Dilution	Raw Count	Identification	CFU/		
3080	0.001	32	Aspergillus sp.		98,553	561	0.01	3	Bipolaris sp.	1,682		
308	0.01	2	Chaetomium sp. (b)		616	5605	0.001	1	Cladosporium sp.	5,605		
3080	0.001	5	Cladosporium sp.		15,399	5605	0.001	1	Curvularia sp.	5,605		
308	0.01	2	Epicoccum nigrum		616	561	0.01	1	Eurotium sp.	561		
3080	0.001	2	Eurotium sp.		6,160	561	0.01	3	Penicillium sp.	1,682		
3080	0.001	12	Penicillium sp.		36,957	561	0.01	18	Wallemia sebi (a)	10,090		
3080	0.001	1	Rhodotorula sp. (b)		3,080							
3080	0.001	3	Wallemia sebi (a)		9,239							
308	0.01	6	Yeast (b)		1,848							
			Total		172,467/gram				Total	25,224/gram		

The uncertainty of measurement associated with the measurement results contained in the report is available upon request.

(a) = ERMI Group 1

(b) = associated with high water activity

(c) = major contributor of Aspergillosis

Samples grown on Malt Extract, DG18 and Cellulose agars.

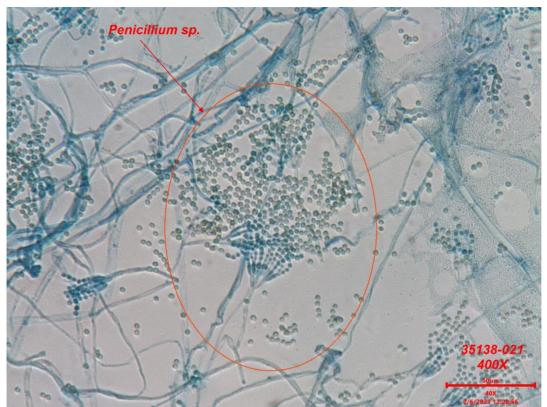
Limit of Detection based upon the dilution plate that fungi were counted.

Standard Limit of Detection for all samples = 100 CFU

Richard Johnson, Laboratory Director

LAB-FRM-ITS-005

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Company Air Allergen

Project 8030 Preswick Circle

Location Media room carpet

SampleType Dust

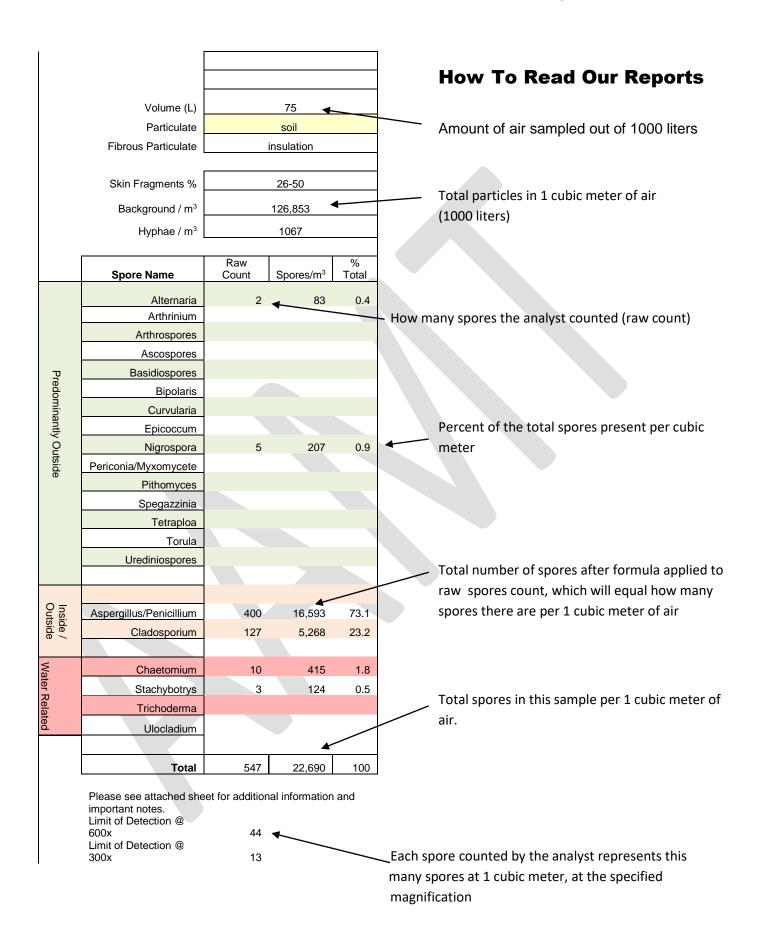
AAMT Nbr 35138-021 **Date Analyzed** 02/06/2023

Information on specific organisms listed can be viewed on our Fungal Organisms Description page.

Background particle information can be found on the How to Read Our Reports section.

Richard Johnson, Laboratory Director

Occhard Johnson



How to Read Our Reports

The major groups of spores are separated into

Predominantly Outside	Inside / Outside	Water Related

This is to make it easier to compare important groupings on the report.

- 1. The spore types, as well as the number identified is important. High levels of *Aspergillus / Penicillium*, and any level of the Water Related organisms should be of concern.
- 2. The <u>Outside</u> sample is used to verify that the sampling equipment is operating correctly. The Outside sample can also be used to determine if the HVAC is operating properly and as a comparison to the spores recovered inside.
- 3. The **Background** is represented as particles per cubic meter. The higher the number of particles the more likely that the HVAC is not operating correctly, or there may be overcrowding in the room. High levels of particles can also be an indicator of poor air quality that can lead to respiratory irritation.
- 4. **Skin fragments** are common in the indoor air. As the % of fragments rise, the more chance that it may be indicating poor circulation or overcrowding.
- 5. <u>Particles and Fibers</u> If there is something important to note or if dust mite parts are observed, it will be noted on the SPORE TRAP COMMENTS page. Only major categories are listed.
- 6. <u>Hyphae</u> are analogous to the stem of a plant. The spores arise from the hyphae, therefore, hyphae should be taken into account when looking at the total spore count, although they are not a part of that number. Hyphae can also give rise to new fungus growth
- 7. The **spore types** are explained in the Organism section of the report.
- 8. The <u>Limit of Detection</u> is equal to one spore counted by the analyst divided by the inverse of the volume sampled and by the percent of the slide analyzed. If the detection limit is 44, it means that every spore in the raw count equals 44 spores of that type in 1 cubic meter of air for 75 liters of air collected, with an analysis of 30% of the slide at 600x (magnification).
- 9. Not all spores can be definitively categorized due to the similarity in morphologies. Spores are classified according to the closest scientific description available.

FUNGAL ORGANISM DESCRIPTIONS

Genus Acremonium Alternaria Alternaria Arthrinium	Species species alternata sp. species	soil, dead leaves, carpet, gypsum board carpet and air. Mostly an outside spore on plants and in soil soil, forest litter, plant materials, decaying wood, decaying wood in crawl	generally recovered lin large numbers occurs in small amounts	from water damaged inside wall board and carpeting	Activity Indicator YES YES	Mycotoxins Produced NO YES	Health Risk Type keratitis, mycetoma, aspergillosis phaeohypho-mycosis, infections of bone, cutaneous tissue, ears, eyes, paranasal sinuses and urinary tract	Found in Combination with Stachybotrys, Chaetomium, Trichoderma, Aspergillus, Penicillium Bipolaris, Curvualria, Cladosporium, Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Acremonium Alternaria Alternaria	species alternata sp.	gypsum board carpet and air. Mostly an outside spore on plants and in soil soil, forest litter, plant materials, decaying wood,	lin large numbers occurs in small amounts	Often recovered from water damaged inside wall board and carpeting	YES	NO	keratitis, mycetoma, aspergillosis phaeohypho-mycosis, infections of bone, cutaneous tissue, ears, eyes, paranasal sinuses and	Stachybotrys, Chaetomium, Trichoderma, Aspergillus, Penicillium Bipolaris, Curvualria, Cladosporium, Pithomyces, Epicoccum, Drechslera,
Alternaria Alternaria	alternata sp.	gypsum board carpet and air. Mostly an outside spore on plants and in soil soil, forest litter, plant materials, decaying wood,	lin large numbers occurs in small amounts	from water damaged inside wall board and carpeting			phaeohypho-mycosis, infections of bone, cutaneous tissue, ears, eyes, paranasal sinuses and	Trichoderma, Aspergillus, Penicillium Bipolaris, Curvualria, Cladosporium, Pithomyces, Epicoccum, Drechslera,
Alternaria	sp.	outside spore on plants and in soil soil, forest litter, plant materials, decaying wood,	amounts		YES	YES	of bone, cutaneous tissue, ears, eyes, paranasal sinuses and	Cladosporium, Pithomyces, Epicoccum, Drechslera,
Arthrinium	species	materials, decaying wood,	not often occuring					,
		spaces	inside, generally outside in moderate numbers. Often found on decaying wood in crawl spaces	OUT		NO	NA	Curvualria, Bipolaris, Cladosporium, Pithomyces, Epicoccum
Ascospores		wide variety of substrates. Plant, soil, air, cellulose materials, wood in crawl spaces	at certain times of year, found in large numbers outside	OUT	Chaetomium globosum, Eurotium species - YES. Most other genera and species, NO	dependent on genus or species recovered	Not generally involved with human disease.	Basidiospores (if outside), not generally recovered on laboratory media.
Aspergillus	flavus	common in seeds, nuts and cereals		вотн	YES	YES	Respiratory pathogen. Second most often cause of aspergillosis and/or invasive aspergillosis	Aspergillus sp, Penicillium sp.
Aspergillus (Neosartorya)	fumigatus (fischeri)	Air, Carpet, HVAC	Must be < 1. Not tolerated at any level inside.	NA	NA	YES	Respiratory pathogen. Most often cause of aspergillosis and/or invasive aspergillosis	Aspergillus versicolor, Aspergillus sydowii, Aspergillus niger, Penicillium sp., Cladosporium sp., bacteria
Aspergillus br	orasiliensis / niger	food, indoor air		вотн	YES	YES	aspergillosis	other Aspergillus, Penicillium
Aspergillus	ochraceus	coffee beans, spices, soil		вотн	YES	YES	aspergillosis	Aspergillus versicolor, Aspergillus sydowii, Aspergillus niger, Penicillium sp., Cladosporium sp., bacteria

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Organism		Recovered From	Comments	Inside / Outside	High Water Activity	Mycotoxins	Health Risk	Found in
Genus	Species			Spore Type	Indicator	Produced	Type	Combination with
Aspergillus	species	soil, food, air, carpet, HVAC	Large amounts when recovered	вотн	YES several species	YES several species	aspergillosis, allergy	Penicillium
Aspergillus	sydowii	soil, food, leather		ВОТН	YES	NO	aspergillosis	other Aspergillus, Penicillium
Aspergillus	ustus	food, indoor environment		BOTH	YES	NO	aspergillosis	other Aspergillus, Penicillium
Aspergillus	versicolor	HVAC, insulation, carpet, air	Must be < 1. Not tolerated at any level inside.	NA	NA	YES	aspergillosis	Aspergillus sydowii, Aspergillus fumigatus, Aspergillus usuts
Aureobasidium	pullulans	food, indoor, soil, leaf, seeds, fruit drinks, carpet, wet areas		INSIDE	YES	NO	corneal, peritoneal, cutaneous, pulmonary, systemic mycosis	yeasts, Chaetomium, Stachybotrys, Trichoderma, Aspergillus, Penicillium
Basidiospores		soil, wood, cellulose materials, plywood when wet related to "wood rot"	large amounts	OUTSIDE	YES	NO for air, YES for some mushrooms	NONE from air. Some mushrooms ingested can contain dangerous toxins	Ascospores, recovered on laboatory media as sterile mycelium, sometimes with "clamps" and/or arthrospores
Bispora	sp.	soil, wood		OUTSIDE	NO	NO	NA	Bipolaris, Curvualria, Cladosporium, Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Chrysonilia	Species	soil	also known as Neurospora	вотн	NO	NO	NA	NA
Chaetomium Chaetomium	species globosum	Ascospore commonly associated with wet gypsum board. Present in soil	Large amounts when recovered	INSIDE	YES	NO	occasionally associated with infections of blood, brain, skin and nails	yeasts, Stachybotrys, Trichoderma, Aspergillus, Penicillium

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Organism		Recovered From	Comments	Inside / Outside	High Water Activity	Mycotoxins	Health Risk	Found in
Genus	Species			Spore Type	Indicator	Produced	Туре	Combination with
Cladosporium	cladosporioides	plant material, soil, indoor air, carpet, HVAC	common spore in the indoor air. Indicates normal air when greater than C. sphaerospermum	BOTH	NO	NO	NA NA	Alternaria, Curvualria, Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Cladosporium	sphaerospermum	plant material, soil, indoor air, carpet, HVAC	high amount in indoor air indicates poor air quality	вотн	YES	NO	NA	Cladosporium cladosporioides, Aspergillus sp., Penicillium sp.
Cladosporium	species	plant material, soil, indoor air, carpet, HVAC		вотн	NO	NO	NA	Alternaria, Curvualria, Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Curvularia	species	soil, plant material, carpet, cellulose materials (paper)		вотн			opportunisitc pathogen of cornea and sinuses. Related to keratitis, endocarditis, mycetoma and pulmonary infection.	Alternaria, Cladosporium species Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Dicyma	species	soil	related to wood rot	OUT	YES	NO	NA	Chaetomium, Stachybotrys, Trichoderma
Epicooum	nigrum	plants, soil, carpet, air, seeds	generally recovered in small numbers	primarily outside but is common inside, as well.	NO	NO	None	Alternaria, Curvualria, Cladosporium spcies, Pithomyces, Drechslera, Exserohilum, Helminthosporium
Eurotium Eurotium	amstelodami herbariorum	soil, variety of food, indoor air		вотн	NO Although, Xerophillic, often found in water damaged buildings.	NO	aspergillosis	Aspergillus, Penicillium
Fusarium	species	grains, soils, apples, potatoes, sugar beet, maize	few, when recovered	вотн	NO	YES several species	keratitis, occasionally mycetoma, sinusitis, septic arthritis and onychomycosis. Contains highly toxic secondary metabolites when ingested in some food grains.	Aspergillus, Penicillium, Acremonium, Epicoccum

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Orga	Prganism Recovered From Comments Inside / Outside Activity Mycotoxins Health Risk		Health Risk	Found in				
Genus	Species			Spore Type	Indicator	Produced	Type	Combination with
Microspcorum	species	human and animal scalp, skin, nails	rarely recovered in air samples	IN	NO	NO	dermatophyte. Ringworm, infections of skin, scalp and nails	Trichopyton, Epidermophyton
Mucor	species	soil, wet damp materials	common bread mold	BOTH	YES	NO	Common cause of zygomycosis	Rhizopus, Absidia, Cunninghamella, Syncephalastrum
Myxomycete		plant pathogen	low, outside	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores
Nigrospora	species	carpet, air, soil, plants		вотн	NO	NO	None	Alternaria, Cladosporium species Pithomyces, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Paecilomyces	variotii	soil, compost	thermophillic	Both	YES	YES	sinusitis, eye infections	Aspergillus, Penicillium
Penicillium	sp.	soil, food	most common spore type found in the indoor air	Both	YES	YES several species of the approximately 200 known	Aspergillosis	Aspergillus, Paecilomyces
Periconia	species	plant pathogen	low, outside	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores
Phoma	species	plant, soil, caroet, wood		BOTH	NO	NO	occsional agent of phaeohyphomycosis	found in combination with a variety of wood rot or plant pathogen fungi
Pithomyces	species	soil, air, plant material	at certain times of the year can be recovered in moderate amounts from	OUTSIDE	NO	NO	NONE	Alternaria,Cladosporium species, Epicoccum, Drechslera, Exserohilum, Helminthosporium
Rhizopus	species	soil, damp wet materials	common bread mold	вотн	YES	NO	Most common cause of zygomycosis	Mucor, Absidia, Cunninghamella, Syncephalastrum

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Organism		Recovered From	Comments	Inside / Outside	High Water Activity	Mycotoxins	Health Risk	Found in
Genus	Species			Spore Type	Indicator	Produced	Туре	Combination with
Rhodotorula	species	wood, behind wall paper, cellulose products, carpets	pink, orange or red yeast, needs very high water activity levels	вотн	YES	NO	NÔNE	Sporobolomyces, Aureobasidium, Chaetomium, Stachybotrys
Scopulariopsis	brevicaulis	soil, wood, food	has a characteristic ammoniacal odor	BOTH	NO	NO	Can infect toenail. May be a risk or subcutaneous or invasive infections of the immunocompromised	Aspergillus, Penicillium
Spegazzinia	species	soil, plants	very small numbers outside	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores
Sporothrix	species	soil, wood, moss		вотн			one species is known to cause human infections	
Stachybotrys Stachybotrys	chartarum echinata	Most often actively growing on the backside of gypsum board. Carpet, HVAC provide sparse growth and sometimes only spores	Must be < 1. Not tolerated at any level inside, although individual spores are occasionally brought in on shoes from the soil.	Most often recovered inside	YES	YES	Neurotoxic. Toxins are damaging to organs but the spores do not grow at body temperature.	Chaetomium, Trichoderma, Acremonium, Ulocladium, Aspergillus usuts
Stemphylium	species	soil, grass, wood, paper	in small numbers outside	OUTSIDE	NO	NO	NONE	Alternaria, Cladosporium species, Epicoccum, Drechslera, Exserohilum, Helminthosporium, Curvularia, Pithomyces, Bipolaris
Tetraploa	species	plant material	very small numbers outside	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores
Torula	species	soil, plants	very small numbers outside	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores

Orga	anism	Recovered From	Comments	Inside / Outside	High Water Activity	Mycotoxins	Health Risk	Found in
Genus	Species			Spore Type	Indicator	Produced	Туре	Combination with
Trichoderma	species	soil, plant material, carpet, cellulose materials (paper), decaying wood	clumps of green spores in large numbers	вотн	YES	NO	T. viride is associated with aspergillosis. T. harzianum is associated with hypersensitivity pneumonitis	Aspergillus, Penicillium, Chaetomium, Acremonium, Stachybotrys
Trichophyton	species	human and animal scalp, skin, nails	rarely recovered in air samples	IN	NO	NO	dermatophyte. Ringworm, infections of skin, scalp and nails	Microsporum, Epidermophyton
Ulocladium	species	soil, grass, wood, paper	in small numbers outside, moderate inside	вотн	YES	NO	NONE	Aspergillus, Penicillium, Chaetomium, Acremonium, Stachybotrys
Uredinospores (Rusts)		plant pathogen	variable in numbers produced	OUTSIDE	NO	NO	NO	seen at various times of the years outside with a combination of other outside spores
Ustilago	species	plant pathogen		вотн	NO	NO	NO	soil organisms
Verticillium	species			OUTSIDE	NO	NO	NO	

GLOSSARY

Actinomycetes	Class of filamentous bacteria associated with water damaged building materials. Strong earthy odor is present. Some genera are associated with skin and respiratory infections. refers to any species of the genera
Aspergillosis	Aspergillus and Penicillium that can infect the respiratory tract, sinuses, ear, eye, skin, mucous membranes and multiple systemic sites. The most common cause of aspergillosis is Aspergillus fumigatus and Aspergillus flavus
Ascomycetes (ascospores)	a class of fungi characterized by the presence of <u>asci</u> and spores, and having two distinct reproductive phases, a perfect stage and an <u>imperfect stage</u> . Outside, mainly found as plant pathogens.
Basidiomycetes (basidiospores)	the largest class of fungi the Basidiomycota has been divided into 2 classes, mushrooms, and the jelly, rust and smut fungi). Major contributor to wood rot.
Chromoblastomycosis	granulomatos inflammation with supprative reaction, generally superficial and/or subcutaneous.
Conidiophore	also known as a " <u>fruiting structure</u> ". Presence of a specialized hyphal structure that serves as a stalk on which the conidia are formed. Indicative of current fungal growth.

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Dermatophyte	a fungus belonging to the genus, <i>Trichophyton, Epidermophyton</i> or <i>Microsporum</i> , with the ability to obtain nutrients from keratin and infect skin, hair, or nails of humans or animals.
Deuteromycetes	The Fungi imperfecti or imperfect fungi, also known as Deuteromycota, are fungi which do not fit into the commonly established taxonomic classifications of fungi that are based on biological species concepts or morphological characteristics of sexual structures because their sexual form of reproduction has never been observed; hence the name "imperfect fungi."
ERMI Group 1	set of fungal organisms that EPA proposes are found in homes that may have health risks due to high levels of "water loving" fungi
Hyalohyphomycosis	saprophytic fungi that produce colorless hyphae
Hyphae	string-like structures that support the spores of fungi. Also called mycelia or mycelium
Keratitis	inflammation of the cornea of the eye
Mycetoma	a localized, chronic cutaneous or subcutaneous infection classically characterized by draining sinuses, granules and swelling.
Mycosis	disease caused by a fungus

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Myxomycetes (slime mold)	A class of peculiar organisms, the slime molds, formerly regarded as animals (Mycetozoa), but now generally thought to be plants and often separated as a distinct phylum (Myxophyta); essentially equivalent to the division Myxomycota. They are found on damp earth and decaying vegetable matter, and consist of naked masses of protoplasm, often of considerable size, which creep very slowly over the surface and ingest solid food.
Onychomycosis	a fungal infection that affects the fingernails or toenails
Phaeohyphomycosis	saprophytic fungi that produce dark brown to black hyphae and infect the skin and may also be subcutaneous.
Sporotrichosis	Subcutaneous infection that may produce ulcerations in the skin.
Sterile Mycelium	hyphae that have an absence of spores or conidia
Subcutaneous	situated or occurring directly under the skin
Supprative	producing puss
Uredinospores (Rusts)	are the thinner-walled <u>spores</u> of some <u>fungi</u> : (<u>rusts</u> and <u>smuts</u>), from which the <u>basidium</u> arises. Plant pathogens.
Xerophillic	Prefers dry places, growing under dry conditions
Zygomycosis	infection caused by opportunistic fungi of the zygomycete group (<i>Rhizopus, Mucor,</i> <i>Rhizomucor, Absidia, Sycephalastrum,</i> <i>Cunninghamella</i>)

AAMT Control # R102 Rev. 0 3/10/2010

Remediation Guidelines & Safety Precautions

All remediation generally follows these steps, the degree of which may vary depending on the level of contamination.

- Identify and eliminate any sources of water intrusion or high humidity.
- Prevent the spread of mold spores with containment when appropriate.
- Remove materials that cannot be cleaned.
- Kill the mold with a fungicide. Capture spores in the air with filtration.
- Remove remaining spores on hard surfaces by wiping.
- Remove remaining spores on porous surfaces, such as drywall or wood framing, by vacuuming, exhausting the vacuum outside.
- Seal any remaining spores on porous materials with an encapsulant.
- Vacuum, clean or replace rugs, furniture, or carpeting.
- Use personal protection appropriate to the level of contamination.
- Use people safe fungicides and encapsulants.

Goggles and a mask with an N95 rating should be worn when working around mold spores. Note that the mask will not protect the wearer from the effects of any chemicals used in the remediation process.

According to the EPA, mold contamination of less than ten square feet can be handled as normal maintenance. For contaminated areas between ten and one hundred square feet, plastic sheeting should be used to minimize air flow to other areas during remediation. For mold contamination in excess of one hundred square feet, additional containment and personal protection is recommended. You can find information regarding protection, containment and other issues at http://www.epa.gov/iaq/molds/table2.htm.

Though chlorine and water are commonly used as a fungicide to clean mold, it is not suggested for cleaning porous materials such as drywall, wooden joists, or studs. Chlorine kills mold but does not do well in killing spores. Chlorine evaporates faster than the water and the water left behind can provide moisture for the remaining spores to begin to grow. Chlorine is a strong oxidizer and can adversely affect the lungs of people exposed to the fumes.

Chemicals used during remediation such as fungicides, encapsulation, and moisture barriers should be investigated to assure that the residue or off-gassing of the material will not cause respiratory distress in the occupants. Consider contacting your Home Improvement or Janitorial Supply Store for recommendations as to products and their use.

Supply or return HVAC vents that service the area being remediated should be taped over during remediation to prevent contaminating other areas of the building. When remediating attics, basements, and crawlspaces that contain HVAC systems or ductwork, all seams in the HVAC system should be taped and any gaps where sheet metal spans joists as a cold air return or where the ductwork enters occupied areas of the building should be sealed to prevent air from the unoccupied areas from entering the occupied areas.

When using containment, a negative pressure should be created in the area being remediated when compared to the rest of the building. This will cause airflow from uncontaminated areas to go in the direction of the area being remediated to limit contamination in the rest of the building.

Although exhausting air scrubbers to the outside to create negative pressure is applicable in some circumstances, air scrubbers exhausted outside can draw air from wall cavities and other places that can further contaminate the work area. Instead of exhausting a large air scrubber outside, consider placing a low-speed box type fan directed outward through a window in the area being remediated that draws air from uncontaminated area to replace the exhausted air. Make especially sure that access to crawlspaces, attics and unfinished basements outside of the work area are sealed to prevent air in areas not served by the HVAC system from being drawn into the work area.

Make sure all causes of water intrusion or moisture damage are properly repaired before remediation is initiated. Porous materials, such as drywall, wood studs, plates, wood floors and other plywood surfaces should be encapsulated after cleaning and prior to reconstruction to provide protection against remaining embedded spores beginning to grow when conditions are favorable.

Drywall or other materials with a light dusting of mold can be wiped with a mild fungicide and vacuumed with a HEPA filter vacuum. Drywall or other materials with obvious visible mold should be cleaned with a fungicide, lightly sanded, vacuumed with a HEPA filter vacuum, and sealed with an encapsulant.

Drywall or other materials with significant mold or water damage as a result of being wetted from the opposite side or flooded should be removed to a point approximately two feet beyond any visible mold or water damage. Insulation that has been wetted or is adjacent to wetted and damaged building materials should also be removed. Baseboards and other trim can be removed to inspect behind the removed trim for mold and water damage.

If removing drywall or other materials from ceilings, walls or floors exposes the area being remediated to another area, both areas should be remediated or provisions should be made to prevent air from the un-remediated area to flow toward the area being remediated.

Surfaces behind any removed materials, such as the backside of an opposite wall, wall studs, base plates, sub-flooring and joists, should also be wiped with a mild fungicide and vacuumed with a HEPA filter vacuum, exhausting the vacuum to the outside air. Surfaces with obvious visible mold or that are slightly damaged should be vacuumed, lightly sanded, cleaned with a fungicide and treated with an encapsulant. A surface with significant mold or mold damage should be replaced.

For vacuuming spores and other particulate from the work surface, use a vacuum cleaner with a HEPA filter. A vacuum cleaner without a HEPA filter will not capture mold spores and respirable particulate. Even with a HEPA filter, consider exhausting the vacuum outside of the building so that any spores that do make it through the filter are not reintroduced into the remediated area or disturb other spores until they have been vacuumed. HEPA filters and exhaust extensions for shop type vacuums are available through janitorial supply stores as well as many home improvement stores.

After treatment and encapsulation, operate the air scrubber for twenty-four to forty-eight hours with the windows closed to remove any remaining spores. Air scrubbers should be turned off at least twenty-fours prior to taking clearance samples.

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

Insured: Prashant Kalavar
Property: 8030 Prestwick Circle
Duluth, GA 30097

Claim Number: Policy Number: Type of Loss:

Date of Loss: Date Received:

Date Inspected: Date Entered: 1/26/2023 2:32 PM

Price List: GAAT8X_JAN23

Restoration/Service/Remodel

Estimate: PRASHANT_KALAVAR

This is a evaluation of damage or estimate for repair of damage. This is only a estimate/evaluation and in no form a binding contract. This evaluation/estimate is priced through Xactimate. The prices in this estimate are a average according to the area and zip codes. Independent Estimates LLC. nor any affiliate guarantees these prices. Inflation of building materials and labor may vary from state to state. Thank you for the opportunity to estimate/evaluate the property listed.

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

PRASHANT_KALAVAR Main Level



Bathroom Height: 8'

253.33 SF Walls 314.65 SF Walls & Ceiling 61.31 SF Ceiling 61.31 SF Floor

6.81 SY Flooring

31.67 LF Floor Perimeter

31.67 LF Ceil. Perimeter

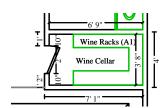
2' 4" X 6' 8" **Opens into BAR** Door DESCRIPTION **QTY** REMOVE REPLACE TAX O&P **TOTAL** 1. Interior door - Detach & reset - slab 1.00 EA 0.00 27.95 0.00 5.60 33.55 only 0.00 0.52 0.18 4.40 26.42 2. Floor protection - heavy paper and 42.00 SF Protect tile floor 3. Heat/AC register - Mechanically 1.00 EA 0.00 16.45 0.00 3.30 19.75 attached - Detach & reset 716.68 4. Custom shower door & partition -47.25 SF 0.00 12.64 0.00 119.44 frameless- Detach & reset 5. Toilet - Detach & reset 1.00 EA 0.00 280.64 0.50 56.22 337.36 6. Light fixture - Detach & reset 79.70 1.00 EA 0.00 66.42 0.00 13.28 7. Bathroom mirror - Detach & reset 1.00 SF 0.00 9.26 0.00 1.86 11.12 8. Vanity top - Detach & reset 3.00 LF 54.17 0.03 32.50 195.04 0.00 9. R&R Vanity - Premium grade 3.00 LF 7.98 475.56 76.55 305.44 1,832.61 10. R&R Plumbing fixture supply line 3.00 EA 5.31 22.47 1.23 16.90 101.47 11. P-trap assembly - Detach & reset 0.00 13.74 82.44 1.00 EA 0.00 68.70 12. R&R Angle stop valve 3.00 EA 5.31 38.42 1.29 26.50 158.98 13. R&R Shower light - waterproof 1.00 EA 209.99 5.83 45.52 273.17 11.83 fixture 14. R&R Crown molding - 2-piece 31.67 LF 0.94 12.11 8.68 84.40 506.37 15. R&R Casing - 3 1/4" 17.00 LF 0.54 3.71 2.46 14.96 89.67 Around door 16. R&R 5/8" drywall - hung, taped, 61.31 SF 0.44 3.12 2.72 44.20 265.19 floated, ready for paint 17. Remove 1/2" drywall - hung, 244.33 SF 0.44 0.00 0.00 21.50 129.01 taped, with smooth wall finish 18. 1/2" drywall - hung, taped, with 253.33 SF 0.00 4.11 10.94 210.42 1,262.55 smooth wall finish

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CONTINUED - Bathroom

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
19. R&R Batt insulation - 4" - R13 - paper / foil faced	126.67 SF	0.26	0.98	5.17	32.44	194.68
Exterior wall insulation						
20. Baseboard - 8" paint grade - 2 piece	18.92 LF	0.00	8.56	4.16	33.24	199.36
Deducted shower						
21. Quarter round - 3/4"	18.92 LF	0.00	2.10	1.11	8.16	49.00
Deducted shower						
22. R&R Switch	3.00 EA	5.35	19.41	0.39	14.94	89.61
Switches got wet						
23. Tub/shower faucet - Detach & reset	1.00 EA	0.00	238.95	0.00	47.80	286.75
24. R&R Tile shower - 121 to 150 SF - High grade	1.00 EA	249.04	3,613.09	90.96	790.62	4,743.71
Estimated footage of floor and walls						
25. R&R Mortar bed for tile floors	20.25 SF	1.44	5.07	2.47	26.88	161.18
26. Add-on for diagonal tile installation	102.00 SF	0.00	1.69	0.00	34.48	206.86
27. R&R Glass tile	11.11 SF	1.90	25.62	10.47	63.24	379.46
28. R&R Tile framed shower curb - per LF	6.75 LF	9.96	109.21	9.32	162.74	976.46
29. R&R 1/2" Cement board	102.00 SF	0.87	4.94	9.73	120.46	722.81
30. Paint the walls and ceiling - two coats	314.65 SF	0.00	1.15	5.10	73.40	440.35
31. Paint baseboard, oversized - two coats	18.92 LF	0.00	1.84	0.25	7.02	42.08
32. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	0.00	37.28	0.32	7.52	45.12
33. Seal & paint base shoe or quarter round	31.67 LF	0.00	0.95	0.23	6.06	36.38
34. Paint crown molding, oversized - two coats	31.67 LF	0.00	1.88	0.36	11.98	71.88
35. Tile/stone sealer	163.31 SF	0.00	1.04	3.23	34.60	207.67
36. Final cleaning - construction - Residential	61.31 SF	0.00	0.31	0.00	3.80	22.81
Totals: Bathroom				253.68	2,499.56	14,997.25

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Wine Cellar Height: 8'

166.67 SF Walls191.42 SF Walls & Ceiling2.75 SY Flooring20.83 LF Ceil. Perimeter

24.75 SF Ceiling 24.75 SF Floor

20.83 LF Floor Perimeter

Door	2' X	X 6' 8''	Оре	ens into BAR		
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
37. Custom shower door & partition - frameless- Detach & reset	29.33 SF	0.00	12.64	0.00	74.14	444.87
Frameless galls door and partition used fo	r wine cellar					
38. Cabinetry - full height unit - Detach & reset	11.67 LF	0.00	84.92	0.00	198.20	1,189.22
Used to detach and reset full hight win cal	binet					
39. Remove Baseboard - 8" paint grade - 2 piece	13.16 LF	0.63	0.00	0.00	1.66	9.95
40. Baseboard - 8" paint grade - 2 piece	20.83 LF	0.00	8.56	4.57	36.58	219.45
41. Quarter round - 3/4" - stain grade	20.83 LF	0.00	2.37	1.56	10.20	61.13
42. Stain & finish base shoe or quarter round	20.83 LF	0.00	1.51	0.29	6.36	38.10
43. Batt insulation replacement per LF - 4" - up to 2' tall	3.67 LF	0.00	2.66	0.37	2.04	12.17
44. 1/2" - drywall per LF - up to 2' tall	3.67 LF	0.00	12.19	0.35	9.02	54.11
45. Paint the walls and ceiling - two coats	191.42 SF	0.00	1.15	3.10	44.64	267.87
46. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	0.00	37.28	0.32	7.52	45.12
Opening ios painted						
47. Paint baseboard, oversized - two coats	20.83 LF	0.00	1.84	0.27	7.72	46.32
48. Snaplock Laminate - per specs from independent analysis	24.75 SF	0.00	6.35	6.19	32.68	196.03
49. Apply plant-based anti-microbial agent to the floor	24.75 SF	0.00	0.29	0.07	1.46	8.71
50. Final cleaning - construction - Residential	24.75 SF	0.00	0.31	0.00	1.54	9.21
Totals: Wine Cellar				17.09	433.76	2,602.26

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Mallway 6' 3" For (A1) With Recki (A1)	ing Room				I	Height: Tray	
1 2 7 2 13 9 3 7 1	678.3	6 SF Walls		595.14 SF Ceiling 557.21 SF Floor			
room Living Room	1,273.5	0 SF Walls & C	eiling				
3'3"	61.9	1 SY Flooring		83.82	LF Floor Perim	eter	
2'11" 3'6" 2'10" 2'5" 7" -9'6 911" -1	89.6	6 LF Ceil. Perin	neter				
Window	2' 8	'' X 5'		Opens into Exterior			
Window	2' 8	'' X 5'		Opens into Exterior	•		
Window	2' 8	'' X 5'		Opens into Exterior	•		
Window	2' 8	'' X 5'		Opens into Exterior			
Door	2' 6	'' X 6' 8''		Opens into Exterior			
Window	2' 8	'' X 5'		Opens into Exterior			
Window	2' 8	'' X 5'		Opens into Exterior			
Missing Wall	13'	9 1/8'' X 8'		Opens into BAR			
Missing Wall	3" 2	X 8'		Opens into BAR			
Missing Wall - Goes to Floor	5' 1	0" X 6' 8"		Opens into HALLWAY			
Door	2' 6	'' X 6' 8''		Opens into BEDRO	OM		
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL	
51. Window drapery - hardware - Detach & reset	5.00 EA	0.00	34.12	0.00	34.12	204.72	
52. Heat/AC register - Mechanically attached - Detach & reset	1.00 EA	0.00	16.45	0.00	3.30	19.75	
Wall grill							

DESCRIPTION	Q11	KENIOVE	REFLACE	IAA	Oar	IOIAL
51. Window drapery - hardware - Detach & reset	5.00 EA	0.00	34.12	0.00	34.12	204.72
52. Heat/AC register - Mechanically attached - Detach & reset	1.00 EA	0.00	16.45	0.00	3.30	19.75
Wall grill						
53. Light fixture - Detach & reset	4.00 EA	0.00	66.42	0.00	53.14	318.82
Wall sconce						
54. Batt insulation replacement per LF - 4" - up to 2' tall	46.74 LF	0.00	2.66	4.77	25.82	154.92
55. Remove 1/2" - drywall per LF - up to 2' tall	7.08 LF	2.38	0.00	0.00	3.38	20.23
Additional drywall to be removed at firep	lace area					
56. 1/2" - drywall per LF - up to 2' tall	53.82 LF	0.00	12.19	5.07	132.24	793.38
57. Casing - 3 1/4"	64.00 LF	0.00	3.71	9.25	49.34	296.03
58. R&R Window stool & apron	18.00 LF	0.81	9.34	4.43	37.42	224.55
Must be removed to repair drywall						
59. Baseboard - 8" paint grade - 2 piece	83.82 LF	0.00	8.56	18.41	147.18	883.09
60. Quarter round - 3/4"	83.82 LF	0.00	2.10	4.93	36.18	217.13
61. Paint the walls - two coats	678.36 SF	0.00	1.15	10.99	158.22	949.32

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CONTINUED - Living Room

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
62. Paint door/window trim & jamb - 2 coats (per side)	7.00 EA	0.00	37.28	2.26	52.66	315.88
63. Paint door/window trim & jamb - Large - 2 coats (per side)	2.00 EA	0.00	43.87	0.76	17.70	106.20
64. Seal & paint window stool and apron	18.00 LF	0.00	4.73	0.43	17.10	102.67
65. Seal & paint base shoe or quarter round	83.82 LF	0.00	0.95	0.60	16.04	96.27
66. Apply plant-based anti-microbial agent to the floor	557.21 SF	0.00	0.29	1.67	32.66	195.92
67. Snaplock Laminate - per specs from independent analysis	557.21 SF	0.00	6.35	139.41	735.54	4,413.23
68. Final cleaning - construction - Residential	557.21 SF	0.00	0.31	0.00	34.54	207.28
Totals: Living Room				202.98	1,586.58	9,519.39

_][+++101 $+++$ 1	tairs1 (2)
	Base cab (A2)Full (A	5)Stairs -3' 8" -
nical	™ 1- (A4)	Bath
ř .01.	b <u>(</u> A4) ≡ Bar	2. 1
	Bail /	SVine i
Щ,	Bar (A1)	Wine
7	13' 9"	

Door

Door

Missing Wall

Missing Wall

Missing Wall

Bar Height: 8'

> 148.64 SF Ceiling 249.67 SF Walls 148.64 SF Floor 398.31 SF Walls & Ceiling

16.52 SY Flooring

2' 4" X 6' 8"

13' 9 1/8" X 8'

2' X 6' 8"

3" X 8"

31.21 LF Ceil. Perimeter

Opens into BATHROOM Opens into WINE_CELLAR Opens into LIVING_ROOM

31.21 LF Floor Perimeter

Opens into LIVING_ROOM

Opens into STAIRS

1' 3" X 8' Opens into STAIRS 3' 7 5/8" X 8'

Missing Wall	3' 7	3' 7 5/8" X 8'		Opens into STAIRS		
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
69. Refrigerator - Remove & reset	1.00 EA	0.00	46.17	0.00	9.24	55.41
70. Dishwasher - Detach & reset	1.00 EA	0.00	268.69	0.00	53.74	322.43
71. Stain & finish toe-kick	19.58 LF	0.00	1.84	0.26	7.26	43.55
72. Toe kick - unfinished wood - 1/2"	19.58 LF	0.00	9.78	4.16	39.14	234.79
73. Baseboard - 8" paint grade - 2 piece	8.00 LF	0.00	8.56	1.76	14.06	84.30

Approximately 8 ft to replace due to cabinets along walls

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CONTINUED - Bar

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
74. Paint baseboard, oversized - two coats	8.00 LF	0.00	1.84	0.11	2.96	17.79
75. Quarter round - 3/4"	8.00 LF	0.00	2.10	0.47	3.46	20.73
76. Seal & paint base shoe or quarter round	8.00 LF	0.00	0.95	0.06	1.54	9.20
77. Paint door/window trim & jamb - 2 coats (per side)	2.00 EA	0.00	37.28	0.65	15.06	90.27
78. Paint the surface area - two coats	56.00 SF	0.00	1.15	0.91	13.06	78.37
Area of drywall exposed						
79. Trim board - 1" x 8" - installed (hardwood - oak or =)	14.08 LF	0.00	10.76	6.88	31.68	190.06
80. Stain & finish trim	14.08 LF	0.00	1.85	0.19	5.26	31.50
81. Apply plant-based anti-microbial agent to the floor	148.64 SF	0.00	0.29	0.45	8.72	52.28
82. Snaplock Laminate - per specs from independent analysis	148.64 SF	0.00	6.35	37.19	196.22	1,177.27
83. Final cleaning - construction - Residential	148.64 SF	0.00	0.31	0.00	9.22	55.30
Totals: Bar				53.09	410.62	2,463.25

Stairs

21.96 SF Walls

21.96 SF Walls

27.11 SF Walls & Ceiling

9.85 SF Floor

1.09 SY Flooring1.42 LF Ceil. Perimeter

Missing Wall 3' 7 5/8" X 16' 1 9/16" Opens into BAR Missing Wall 1' 3" X 16' 1 9/16" Opens into BAR

Subroom: Stairs1 (2) Height: 14' 11" 101.20 SF Walls 11.51 SF Ceiling 112.71 SF Walls & Ceiling 11.51 SF Floor Stairs1 (2) 6.80 LF Floor Perimeter 1.28 SY Flooring 6.80 LF Ceil. Perimeter **Missing Wall** 3' 7 5/8" X 14' 10 9/16" **Opens into STAIRS** 3' X 14' 10 9/16" **Missing Wall Opens into STAIRS2** PRASHANT_KALAVAR 4/12/2023 Page: 7

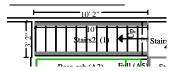
Height: 16' 2"

1.55 LF Floor Perimeter

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CONTINUED - Stairs

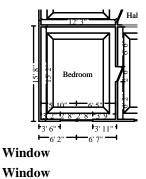
Subroom: Stairs2 (1) Height: 14' 11"



243.75 SF Walls273.63 SF Walls & Ceiling5.97 SY Flooring22.92 LF Ceil. Perimeter

29.88 SF Ceiling53.76 SF Floor27.21 LF Floor Perimeter

Missing Wall 3' X 14' 10 9/16" **Opens into STAIRS1** DESCRIPTION **QTY** REMOVE REPLACE TAX 0&P**TOTAL** 84. R&R Stair riser - up to 4' 1.00 EA 3.62 24.93 0.58 5.82 34.95 85. R&R Stair tread - hardwood - up to 1.00 EA 9.96 92.92 3.56 21.30 127.74 86. R&R Stair Skirt/Apron - wall side -2.00 LF 2.49 20.49 0.39 9.28 55.63 paint grade 87. Base cap 2.00 LF 0.00 2.06 0.11 0.84 5.07 88. Paint stair skirt/apron 35.56 LF 0.00 6.94 0.73 49.50 297.02 89. Seal & paint stair riser - per side -46.67 LF 0.00 4.23 1.76 39.84 239.01 per LF 90. Stain & finish stair tread - per side -50.00 LF 0.00 7.34 2.55 73.92 443.47 per LF 91. Painter - per hour 15.00 HR 0.00 81.70 0.00 245.10 1,470.60 To sand all remaining stain grade treads for new stain to be applied. 1 hour per tread 92. Paint the walls and ceiling - two 413.45 SF 0.00 1.15 6.70 96.44 578.61 coats 93. Final cleaning - construction -75.12 SF 0.00 0.31 0.00 4.66 27.95 Residential Totals: Stairs 16.38 546.70 3,280.05



Door

2' 8" X 5' 2' 8" X 5' 2' 6" X 6' 8"

438.67 SF Walls

20.64 SY Flooring

642.20 SF Walls & Ceiling

54.83 LF Ceil. Perimeter

Bedroom

185.79 SF Floor
54.83 LF Floor Perimeter

Opens into Exterior
Opens into Exterior
Opens into LIVING ROOM

203.53 SF Ceiling

PRASHANT_KALAVAR 4/12/2023 Page: 8

Height: Tray

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CONTINUED - Bedroom

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
94. Interior door - Detach & reset - slab only	1.00 EA	0.00	27.95	0.00	5.60	33.55
95. Window drapery - hardware - Detach & reset	1.00 EA	0.00	34.12	0.00	6.82	40.94
96. 1/2" - drywall per LF - up to 4' tall	27.42 LF	0.00	17.50	4.79	96.94	581.58
97. Batt insulation replacement per LF - 4" - up to 2' tall	27.42 LF	0.00	2.66	2.80	15.14	90.88
98. R&R Casing - 3 1/4"	10.00 LF	0.54	3.71	1.45	8.80	52.75
To repair drywall						
99. R&R Window stool & apron	6.00 LF	0.81	9.34	1.48	12.48	74.86
100. Baseboard - 8" paint grade - 2 piece	54.83 LF	0.00	8.56	12.04	96.26	577.64
101. Paint the walls - two coats	438.67 SF	0.00	1.15	7.11	102.32	613.90
102. Paint baseboard, oversized - two coats	54.83 LF	0.00	1.84	0.72	20.32	121.93
103. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	0.00	37.28	0.32	7.52	45.12
104. Paint door/window trim & jamb - Large - 2 coats (per side)	1.00 EA	0.00	43.87	0.38	8.86	53.11
105. Seal & paint window stool and apron	6.00 LF	0.00	4.73	0.14	5.70	34.22
106. Carpet pad - High grade	185.79 SF	0.00	0.82	7.91	32.06	192.32
8lb pad estimated for concrete floor						
107. Remove Carpet - per specs from independent carpet analysis	185.79 SF	0.29	0.00	0.00	10.78	64.66
108. Carpet - per specs from independent carpet analysis	213.66 SF	0.00	6.17	69.61	277.58	1,665.47
15% added for waste						
109. Additional labor cost for Berber or patterned carpets	185.79 SF	0.00	0.21	0.00	7.80	46.82
110. Final cleaning - construction - Residential	185.79 SF	0.00	0.31	0.00	11.52	69.11
Totals: Bedroom				108.75	726.50	4,358.86

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Hallway Height: 7' 7"

131.74 SF Walls
27.81 SF Ceiling
159.54 SF Walls & Ceiling
27.81 SF Floor
2.00 SV Flooring
16.67 LF Floor D

3.09 SY Flooring 16.67 LF Floor Perimeter 22.50 LF Ceil. Perimeter

Door 2' 6" X 6' 8"

Door 2' 6" X 6' 8"

Missing Wall - Goes to Floor 5' 10" X 6' 8"

Opens into PLAYROOM
Opens into THEATER
Opens into LIVING_ROOM

			· F · · · · · · · · · · · · · · · · · ·			
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
111. Baseboard - 8" paint grade - 2 piece	16.67 LF	0.00	8.56	3.66	29.28	175.64
112. Quarter round - 3/4"	16.67 LF	0.00	2.10	0.98	7.20	43.19
113. Paint the walls - two coats	131.74 SF	0.00	1.15	2.13	30.72	184.35
114. Paint baseboard, oversized - two coats	16.67 LF	0.00	1.84	0.22	6.18	37.07
115. Paint door/window trim & jamb - 2 coats (per side)	2.00 EA	0.00	37.28	0.65	15.06	90.27
116. Paint door/window trim & jamb - Large - 2 coats (per side)	1.00 EA	0.00	43.87	0.38	8.86	53.11
117. Apply plant-based anti-microbial agent to the floor	27.81 SF	0.00	0.29	0.08	1.64	9.78
118. Snaplock Laminate - per specs from independent analysis	27.81 SF	0.00	6.35	6.96	36.72	220.27
119. Final cleaning - construction - Residential	27.81 SF	0.00	0.31	0.00	1.72	10.34
Totals: Hallway				15.06	137.38	824.02



Mechanical Height: 9'

 366.56 SF Walls
 88.13 SF Ceiling

 454.69 SF Walls & Ceiling
 88.13 SF Floor

9.79 SY Flooring 40.73 LF Floor Perimeter

40.73 LF Ceil. Perimeter

Door 2' 6" X 6' 8" Opens into PLAYROOM

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
120. Batt insulation replacement per LF - 4" - up to 2' tall	40.73 LF	0.00	2.66	4.15	22.50	134.99

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CONTINUED - Mechanical

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
Totals: Mechanical				4.15	22.50	134.99

 Under stairs
 Height: Sloped

 138.65 SF Walls
 35.50 SF Ceiling

 174.15 SF Walls & Ceiling
 28.25 SF Floor

Under stairs

174.15 SF Walls & Ceiling
3.14 SY Flooring

14 SY Flooring 24.83 LF Floor Perimeter

29.67 LF Ceil. Perimeter

Missing Wall - Goes to Floor	2' 8" X 6' 8"		Opens into Exterior			
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
121. 1/2" - drywall per LF - up to 4' tall	21.83 LF	0.00	17.50	3.81	77.16	463.00
122. Batt insulation replacement per LF - 4" - up to 2' tall	21.83 LF	0.00	2.66	2.23	12.06	72.36
123. Final cleaning - construction - Residential	28.25 SF	0.00	0.31	0.00	1.76	10.52
Totals: Under stairs				6.04	90.98	545.88

Playroom Height: 8'
454.67 SF Walls 144.84 SF Ceiling

599.51 SF Walls & Ceiling 16.09 SY Flooring

56.83 LF Ceil. Perimeter

SY Flooring 56.83 LF Floor Perimeter

144.84 SF Floor

Door 2' 6" X 6' 8" Opens into HALLWAY

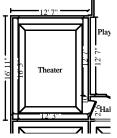
Door 2' 6" X 6' 8" Opens into MECHANICAL

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
124. Interior door - Detach & reset - slab only	1.00 EA	0.00	27.95	0.00	5.60	33.55
125. Batt insulation replacement per LF - 4" - up to 2' tall	6.33 LF	0.00	2.66	0.65	3.50	20.99
126. 1/2" - drywall per LF - up to 2' tall	17.50 LF	0.00	12.19	1.65	43.00	257.98
127. Baseboard - 8" paint grade - 2 piece	56.83 LF	0.00	8.56	12.48	99.80	598.74

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

CONTINUED - Playroom

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
128. Paint the walls - two coats	454.67 SF	0.00	1.15	7.37	106.06	636.30
129. Paint baseboard, oversized - two coats	56.83 LF	0.00	1.84	0.75	21.08	126.40
130. Paint door/window trim & jamb - 2 coats (per side)	2.00 EA	0.00	37.28	0.65	15.06	90.27
131. Carpet pad - High grade	144.84 SF	0.00	0.82	6.17	25.00	149.94
8lb pad estimated for concrete floor						
132. Remove Carpet - per specs from independent carpet analysis	144.84 SF	0.29	0.00	0.00	8.40	50.40
133. Carpet - per specs from independent carpet analysis	166.57 SF	0.00	6.17	54.27	216.40	1,298.41
15% added for waste						
134. Additional labor cost for Berber or patterned carpets	144.84 SF	0.00	0.21	0.00	6.08	36.50
135. Final cleaning - construction - Residential	144.84 SF	0.00	0.31	0.00	8.98	53.88
Totals: Playroom				83.99	558.96	3,353.36



Theater Height: Tray

458.67 SF Walls 678.55 SF Walls & Ceiling

22.34 SY Flooring57.33 LF Ceil. Perimeter

219.88 SF Ceiling201.10 SF Floor57.33 LF Floor Perimeter

O&P

Door2' 6" X 6' 8"Opens into HALLWAYDESCRIPTIONQTYREMOVEREPLACETAX136. Interior door - Detach & reset - slab only1.00 EA0.0027.950.00

136. Interior door - Detach & reset - slab only	1.00 EA	0.00	27.95	0.00	5.60	33.55
137. Light fixture - Detach & reset	4.00 EA	0.00	66.42	0.00	53.14	318.82
138. In-wall / In-ceiling speaker - Detach & reset	4.00 EA	0.00	24.07	0.00	19.26	115.54
139. 1/2" - drywall per LF - up to 4' tall	28.67 LF	0.00	17.50	5.01	101.34	608.08
140. Batt insulation replacement per LF - 4" - up to 2' tall	28.67 LF	0.00	2.66	2.92	15.84	95.02
141. Drywall patch / small repair, ready for paint	7.00 EA	0.00	97.06	1.70	136.22	817.34
142. Baseboard - 8" paint grade - 2 piece	57.33 LF	0.00	8.56	12.59	100.66	603.99
RASHANT_KALAVAR					4/12/2023	Page: 12

TOTAL

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

CONTINUED - Theater

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
143. Paint the walls - two coats	458.67 SF	0.00	1.15	7.43	106.98	641.88
144. Paint baseboard, oversized - two coats	57.33 LF	0.00	1.84	0.76	21.26	127.51
145. Paint door/window trim & jamb - 2 coats (per side)	1.00 EA	0.00	37.28	0.32	7.52	45.12
146. Carpet pad - High grade	201.10 SF	0.00	0.82	8.57	34.70	208.17
8lb pad estimated for concrete floor						
147. Remove Carpet - per specs from independent carpet analysis	201.10 SF	0.29	0.00	0.00	11.66	69.98
148. Carpet - per specs from independent carpet analysis	231.27 SF	0.00	6.17	75.35	300.46	1,802.75
15% added for waste						
149. Additional labor cost for Berber or patterned carpets	201.10 SF	0.00	0.21	0.00	8.44	50.67
150. Final cleaning - construction - Residential	201.10 SF	0.00	0.31	0.00	12.46	74.80
Totals: Theater				114.65	935.54	5,613.22
Mitigation		Mitigatio	on			
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
151. Serv Pro South Mitigation	1.00 EA	0.00	8,825.37	0.00	0.00	8,825.37
Total: Mitigation				0.00	0.00	8,825.37
		HVAC				
HVAC						
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
152. Heat, Vent, & Air Conditioning	QTY 1.00 EA	REMOVE 0.00	REPLACE 559.50	TAX 0.00	O&P 0.00	
DESCRIPTION 152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC						559.50
152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC			559.50	0.00	0.00	559.50
152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC		0.00	559.50	0.00	0.00	559.50 559.50
152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC General Construction		0.00	559.50	0.00	0.00	559.50 559.50
152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC General Construction DESCRIPTION 153. Dumpster load - Approx. 12	1.00 EA	0.00 General Const	559.50	0.00	0.00	559.50 559.50 TOTAL
152. Heat, Vent, & Air Conditioning (Bid Item)	1.00 EA QTY	0.00 General Const REMOVE	559.50 ruction REPLACE	0.00 0.00	0.00 0.00	559.50
152. Heat, Vent, & Air Conditioning (Bid Item) Total: HVAC General Construction DESCRIPTION 153. Dumpster load - Approx. 12 yards, 1-3 tons of debris	1.00 EA QTY	0.00 General Const REMOVE	559.50 ruction REPLACE	0.00 0.00	0.00 0.00	559.50 559.50

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CONTINUED - General Construction

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL		
154. Cleaning Technician - per hour	48.00 HR	0.00	47.07	0.00	451.88	2,711.24		
2 people 24 hour each to clean all cabinets inside and out, clean light fixtures wipe down ceilings and clean contents.								
155. Negative air fan/Air scrubber (24 hr period) - No monit.	2.00 DA	0.00	73.50	0.00	29.40	176.40		
2 days while cleaning and wiping down.								
156. Add for HEPA filter (for negative air exhaust fan)	1.00 EA	0.00	200.03	10.95	42.20	253.18		
157. Add for personal protective equipment (hazardous cleanup)	4.00 EA	0.00	13.45	3.23	11.40	68.43		
One suit each day for each person								
Total: General Construction				14.18	632.88	3,797.25		

Experts

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
158. Engineering fees (Bid Item)	1.00 EA	0.00	1,780.60	0.00	0.00	1,780.60
Engineer Cost						
159. Air Alergen Cost (Air and mold test)	1.00 EA	0.00	2,086.00	0.00	0.00	2,086.00
160. Expert estimating cost	1.00 EA	0.00	1,500.00	0.00	0.00	1,500.00
161. E&L Services Invoice	1.00 EA	0.00	4,380.00	0.00	0.00	4,380.00
162. HVAC Repair	1.00 EA	0.00	559.50	0.00	0.00	559.50
163. E&L Service plumbing repair bid	1.00 EA	0.00	3,524.00	0.00	0.00	3,524.00
164. Meso Potamia Inc.	1.00 EA	0.00	5,500.00	0.00	0.00	5,500.00
Totals: Experts				0.00	0.00	19,330.10

Contents

DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
165. See Contents List Attached	1.00 EA	0.00	74,150.00	4,449.00	0.00	78,599.00
Totals: Contents				4,449.00	0.00	78,599.00
Total: General Construction				4,463.18	632.88	101,726.35
Total: HVAC				4,463.18	632.88	102,285.85

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Total: Mitigation				4,463.18	632.88	111,111.22
Total: Main Level				5,339.04	8,581.96	158,803.75
Labor Minimums Applied						
DESCRIPTION	QTY	REMOVE	REPLACE	TAX	O&P	TOTAL
166. Toilet & bath accessory labor minimum	1.00 EA	0.00	133.95	0.00	26.80	160.75
167. Tile floor covering labor minimum	1.00 EA	0.00	54.80	0.00	10.96	65.76
168. Heat, vent, & air cond. labor minimum	1.00 EA	0.00	242.10	0.00	48.42	290.52
169. Stone floor covering labor minimum	1.00 EA	0.00	91.38	0.00	18.28	109.66
170. Stairway labor minimum	1.00 EA	0.00	173.65	0.00	34.74	208.39
171. General labor - labor minimum	1.00 EA	0.00	18.46	0.00	3.70	22.16
172. Hazardous waste/mold rem. labor min	1.00 EA	0.00	179.01	0.00	35.80	214.81
Totals: Labor Minimums Applied				0.00	178.70	1,072.05
Line Item Totals: PRASHANT_KALAV	/AR			5,339.04	8,760.66	159,875.80

Grand Total Areas:

1,542.96	SF Walls SF Floor SF Long Wall	171.44	SF Ceiling SY Flooring SF Short Wall	454.32	SF Walls and Ceiling LF Floor Perimeter LF Ceil. Perimeter
,	Floor Area Exterior Wall Area	'	Total Area Exterior Perimeter of Walls	3,204.13	Interior Wall Area
	Surface Area Total Ridge Length		Number of Squares Total Hip Length	0.00	Total Perimeter Length

Coverage	Item Total	%	ACV Total	%
Dwelling	72,813.30	45.54%	72,813.30	45.54%
Other Structures	0.00	0.00%	0.00	0.00%
Contents	87,062.50	54.46%	87,062.50	54.46%
Total	159,875.80	100.00%	159,875.80	100.00%

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Independent Estimates LLC

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

Summary for Dwelling

Line Item Total Material Sales Tax	63,162.60 890.04
Subtotal Overhead Profit	64,052.64 4,380.33 4,380.33
Replacement Cost Value Net Claim	\$72,813.30 \$72,813.30

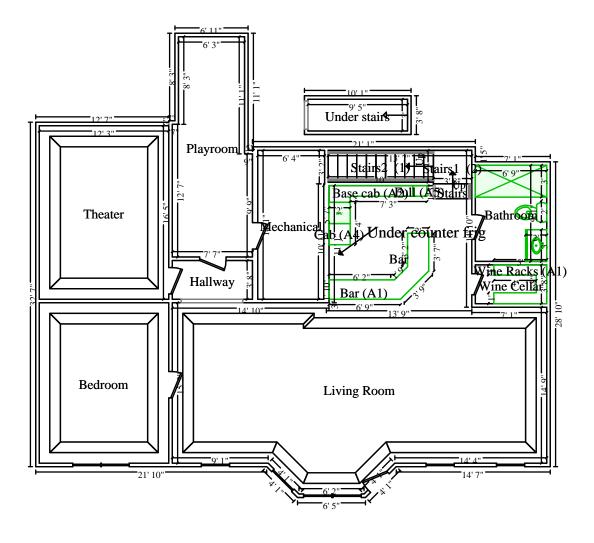
Case 1:23-mi-99999-UNA Doctor Per Post of Filed 07/25/23 Page 62 of 81

Independent Estimates LLC

4 Mountain Creek Dr. S.E Rome, Ga. 30161 706-346-9459 pascotthenderson@gmail.com

Summary for Contents

Line Item Total	82,613.50
Material Sales Tax	4,449.00
Replacement Cost Value	\$87,062.50
Net Claim	\$87,062.50





Main Level

Case 1:23-mi-99999-UNA Doctrie No. Filed 07/25/23 Page 64 of 81

PERSONAL PROPERTY ITEMIZATION

			Item Age				Direct Water/Visible	Original Est. Purchase	
Item #	Model #/Description	Brand/Manufacturer	(Years)	Vendor/Store	Quantity	Room/Location	Mold/Exposure	Price	Material
1	Black Sectional	Decor	8	Décor	1	Basement	Yes	7000	Leather
2	Bose Sub Woofer	Bose	5	Best Buy	1	Basement	Yes	800	
3	Bose L1 Speaker	Bose	5	Best Buy	1	Basement	Yes	1000	
4	TV Console Table	Ethan Allen	8	Ethan Allen	1	Basement	Yes	4500	
5	PS 4 with 2 controllers	Play Station	3	Target	1	Basement	Yes	700	
6	Air Fryer	Brivelle	3	William Sonoma	1	Basement	Yes	400	
7	White Sectional	Décor	8	Décor	1	Basement	Yes	6000	Leather
8	Red love seat with single seater	Décor	8	Décor	1	Basement	Yes	6000	Leather
9	2 Animal Print Single Chairs	Décor	8	Décor	1	Basement	Yes	2000	Cloth
10	4 Black bar stools	Décor	4	Décor	4	Basement	Yes	3200	Leather
11	Mini Fridge (Wine Cooler)	GE	8	Home Depot	1	Basement	Yes	3500	
12	Dishwasher	Kitchenaide	8	Home Depot	1	Basement	Yes	1500	
13	Silver LED Coffee table	Decor	8	Décor	1	Basement	Yes	3000	
14	Office Desk	Bush Furniture	3	Staples	1	Basement	Yes	2000	Wooden - Item Number: 112-UXA888
15	Office Chair	Staples Lockland Ergonomic Leather Managers	3	Staples	1	Basement	Yes	300	Tempur-Pedic TP4000 Fabric Task Chair, (TP4000) Item #: 324022 Model #: TP4000
16	Silver Console table	Zgallerie	8	Zgallerie	1	Basement	Yes	2000	
17	Pool table + Table Tennis topper	California House		Great Southern Home Recreation	1	Basement	Yes	10000	
18	Rugs	Macys	8	Macys	3	Basement	Yes	3000	Brand: Surya Rugs
19	Roll of Wall paper	Elle	1	Elle	1	Basement	Yes	500	
20	Vaccum Cleaner	Hoover	4	Home Depot	1	Basement	Yes	100	
21	Wet Dry Vaccum	Ridgid	4	Home Depot	1	Basement	Yes	100	
22	Ice Maker	Kitchenaide	8	Home Depot	1	Basement	Yes	2730	
23	Wooden coffee table	Ethan Allen	8	Ethan Allen	1	Basement	Yes	2000	
24	End tables	Ethan Allen	8	Ethan Allen	2	Basement	Yes	3000	
25	Microwave	Brivelle	8	William Sonoma	1	Basement	Yes	500	
26	Pizza Oven	Brivelle	8	William Sonoma	1	Basement	Yes	1000	
27	Electric Fireplace	Napolean	5	North Country Fire	1	Basement	Yes	1600	
28	Table Lamps	Zgallerie	8	Zgallerie	2	Basement	Yes	700	
29	Floor Lamp	Zgallerie	8	Zgallerie	1	Basement	Yes	600	

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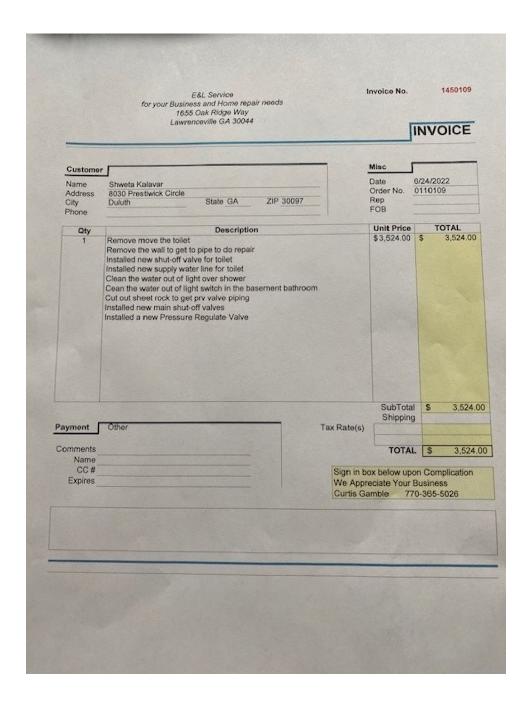
									Dreo Tower Fan 42 Inch, Cruiser Pro T1 Quiet Oscillating Bladeless Fan with Remote, 6 Speeds, 4 Modes, LED Display,
3	0 Floor fans	amazon	5	Amazon	4	Basement	Yes		12H Timer, Black Floor Standing Fan Powerful for Indoor Home Bedroom Office Room
3	1 Bench	Macys	8	Macys	1	Basement	Yes	1600	MOE'S HOME COLLECTION
3	2 Bar Top Table & Chairs	Perigold	5	Perigold	1	Basement	Yes	2500	Cannot find it, but the chairs had leather i

E&L Service for your Business and Home repair needs 1655 Oak Ridge Way Lawrenceville GA 30044

Invoice No. 1450109

INVOICE

Customer			Misc		
Name	Shweta Kalavar		Date	- 6/24/	2022
Address	8030 Prestwick Circle		Order No.	0110	109
City	Duluth State GA ZI	P 30097	Rep		
Phone			FOB		
				1	
Qty	Description		Unit Price		TOTAL
1	Discover of water damage source		\$4,380.00	\$	4,380.00
	cut out sheet rock in few places to get to water lind Installed some new 2x4 for the sheet rock mount Installed new sheet rock in the cut area Mad and taped Prime walls Reinstalled toilet Reinstalled bathroom sink cabinet				
			SubTotal	\$	4,380.00
			Shipping	Ψ	4,000.00
Payment	Other	Tax Rate(s)	- 11 3		
-	•	, ,			
Comments	3		TOTAL	\$	4,380.00
Name					
CC #			k below upon		
Expires			ciate Your Bu		
		Curtis Gan	nble 770-	365-50	026



Case 1:23-mi-99999-UNA Document Documen



Casteel Heating, Cooling, Plumbing and Electrical 305 Petty Road Suite B, Lawrenceville, Ga, 30043 P: 770-565-5884 F: 770-792-6670 www.casteelair.com
HVAC LIC# GA:CN211288
PLUMBING LIC# MP210486
ELECTRICAL LIC# EN215639

BILL TO

Shweta Kalavar 8030 Prestwick Circle Duluth, GA 30097 USA

> INVOICE 642816

INVOICE DATE
Jun 30, 2022

JOB ADDRESS

Shweta Kalavar 8030 Prestwick Circle Duluth, GA 30097 USA Completed Date:

Payment Term: Due Upon Receipt

DESCRIPTION OF WORK

On arrival system was not cooling customer had water damage from a pipe bursting flooding the basement about 2 inches. Customers worried about it affecting the system due to the system is not cooling and operating. Due to the overall renovation and pulling drywall off the walls this area does not properly insulated causing the system to work twice as hard this led to blowing a capacitor not allowing the system to cool. Change the capacitor system is up and running and cooling at this time. Thanks for choosing Casteel.

TASK	DESCRIPTION	QTY	PRICE	TOTAL
DISPFEE	Standard Dispatch Fee	1.00	\$89.00	\$89.00
FUELSURCHARGE	Fuel Surcharge	1.00	\$25.00	\$25.00
T610085	Dual Power Factor Enhancing Component	1.00	\$445.50	\$445.50
	A DPFEC is like a battery used store electricity and give motors a boost when they need to start. From normal usage a capacitor may become worn and need to be replaced.			
	MPT:21.000000			

PAID ON	TYPE	MEMO	AMOUNT
6/30/2022	American Express		\$559.50

POTENTIAL SAVINGS \$44.55-\$89.10

Invoice #642816 Page 23 of 2

SUB-TOTAL	\$559.50
TAX	\$0.00
TOTAL DUE	\$559.50
PAYMENT	\$559.50
BALANCE DUE	\$0.00

All repairs carry a 2 year parts and labor warranty from date of invoice.

Casteel cannot be held liable for the following conditions:

- 1. Water damage due to line blockage, failed pump, frozen lines or broken pipes. Any of these conditions can happen at any time and is out of the control of Casteel. Casteel will flush the lines to ensure proper flow at the time of service. Casteel is not responsible for future costs to modify or repair a drain system to meet code requirements.
- 2. Casteel is not responsible for the existing condition of the attic pull down stairs. Alternative methods may be needed to access the equipment. Casteel cannot be held liable for the replacement or repair of attic stairs that has no negligence on our part.

CUSTOMER AUTHORIZATION

I hereby authorize the above repairs in the total of \$559.50 to be completed by Casteel Heating, Cooling, Plumbing and Electrical.

Sign here Date 6/30/2022

CUSTOMER ACKNOWLEDGEMENT

I hereby acknowledge the above repairs in the total of \$559.50 to have been completed to my satisfaction by Casteel Heating, Cooling, Plumbing and Electrical.

Sign here Date 6/30/2022

I authorize Casteel HVAC Service Department to charge the agreed amount to my credit card provided herein. I agree that I will pay for this purchase in accordance with the issuing bank cardholder agreement.

Sign here Date 6/30/2022

Invoice #642816 Pa@ 24of 2

Meso Potamia Inc.

Address:

1151 Steeple Run

Lawrenceville, GA 30043

DATE:	March 15, 2023
INVOICE #	729

Bill To:

8030 Prestwick Circle Duluth GA

DESCRIPTION	AMOUNT
Replace	
Change out the electircal wiring for the bathroom	
Change 5 electric switches	
Change the light in the bathroom and add a new light	
Change the exhaust and add a new one	
Change the vanity light and add a new one	
Change the wiring and the switch for the stairs	
	5,500.00
Total Cost Around	5,500.00

If you have any questions concerning this invoice, contact Name, Phone Number, E-mail Ahmad Alazzawi

THANK YOU FOR YOUR BUSINESS!

HAIGHT DAVIS & ASSOCIATES, INC.

CONSULTING ENGINEERS

(770) 979-6650

www.haight-davis.com

BILL TO:

FOR:

Shweta and Prashant Kalavar 8030 Prestwick Circle Duluth, Georgia 30097

Invoice

	<u> </u>	
Invoice Date:	Invoice #:	
2/6/2023	2023-211	
Project Number		
LS-22-187		
Terms		
Due on receipt		

Engineering Evaluation at Kalavar Residence, 8030 Prestwick Circle,

Duluth, GA 30097

Date	Description	Hrs/Qty	U/M	Rate	Amount
12/20/2022	New file set up (Administrator Rate)	0.2	hr.	100.00	20.00
1/18/2023	Site visit, including travel (Project Manager Rate)	6.0	hrs.	275.00	1,650.00
2/2/2023	Telephone w/C. Jeffries (Principal Rate)	0.2	hrs.	275.00	55.00
	Photographs on file	1.0	set	5.00	5.00
	Travel Mileage	44.0	mi.	1.15	50.60
	Less Retainer Paid. Thank You!	1.0	ea.	-1,000.00	-1,000.00

REMIT PAYMENT TO: 526 Wagon Wheel Climb Lawrenceville, GA 30044 **Balance Due** \$780.60

Accepted Credit Cards	E-Mail	Tax ID#
Visa, MasterCard and American Express	lisa@haight-davis.com	58-2621161

Merchant: HAIGHT DAVIS AND ASSOCIATE

473 CRICKET RIDGE CT

LAWRENCEVILLE, GA 30044 7709796650

US

Order Information

Description:

Order Number: P.O. Number:

Invoice Number: Customer ID: 2023-211

Billing Information Shipping Information

> Shipping: 0.00

> > Tax: 0.00

Total: USD 780.60

Payment Information

Date/Time: 11-Apr-2023 11:39:00 PDT

Transaction ID: 64302451557

Transaction Type: Authorization w/ Auto Capture **Transaction Status:** Captured/Pending Settlement

186275 Authorization Code:

Payment Method: American Express XXXX1023

Air Allergen & Mold Testing Atlanta Mold & Air Quality Testing for Allergy & Asthma Relief

1543 Lilburn Stone-Mountain Road Stone Mountain, GA 30087

(770) 938.4861 Fax (678) 723.5848

		INVOICE		
Customer	Billing Date: 2/1/2023	INVOICE	Job/Location	Date of Service 1/28/2023
Company:			Invoice Nbr: 3	35138
			Compy Job:	
Name:	Prashant Kalavar		LastName: K	Kalavar
Addr1:	8030 Preswick Circle		Addr1: 8	3030 Preswick Circle
Addr2:			Addr2:	
City:	Duluth GA 30097-		City St [Duluth GA 30097
Otv	Descriptio	on		Unit Price Extended Price

Qty	Description	Unit Price	Extended Price
2	Carpet Dust	128.00	256.00
8	Swab Direct Exam	69.00	552.00
12	Spore Trap Cus	69.00	828.00
1	Half Day Inspection	450.00	450.00
		SubTotal	2086.00
		Tax	0.00
		Paid	0.00
	Pay Status: To Be Pa	id Total	2086.00

Invoice Notes:

Case 1:23-mi-99999-UNA Doctor Per Post of 81

Independent Estimates LLC. 4 Mountain Creek Dr. SE. Rome, Ga. 30161-7700

PH: 706-346-9459

Email: Pascotthenderson@gmail.com



Shweta Kalavar 8030 Prestwick Circle Duluth, Ga. 30097

INVOICE

Invoice # 0000310

Invoice Date 04/17/2023

> **Due Date** 05/01/2023

ltem	Description	Unit Price	Quantity	Amount
Hours	Site inspection, Scope sketch and photograph	125.00	3.00	375.00
Hours	Load all information from site inspection into Xactimate, Sketch and estimate loss.	125.00	6.00	750.00
Hours	Discussions with Carson Jeffries and revisions to estimate as needed.	125.00	1.50	187.50
Hours	Review documents pertaining to loss from experts	125.00	1.00	125.00
		Subtotal		1,437.50
		Total		1,437.50
		Amount Paid		0.00
		Balance Due	1	\$1,437.50

 Θ Loa out Manage my claim > Claim #049942182 Claim filed Claim setup Speed up In review **Payments** your claim **STATUS** We've reviewed your claim and a portion of your damages are FEEDBACK covered by your policy If there are next steps to take, CHEYENNE SANTANA can share any helpful information with you. If you want to review your policy details, you can do so below. View my policy View your claims details: **Payments** X Close July 11, 2022*

Paid to

Amount

\$24155.85

P.30

Safeco Insurance_™ Log out A Liberty Mutual Company BANK, N.A. ITS **Policies SUCCESSO** Address Billing \$ 8030 PRESTWICK CIR, DULUTH, GA 30097-6673 Claims Delivery details The payment should arrive within 5-7 business days via US Postal Service. **Profile** Explanation of payment \vee Get support **FEEDBACK** *All times and dates are displayed and adjusted for Easte My documents Time (ET). July 20, 2022* Amount Paid to \$8583.98 Ardnos, Inc dba Servpro of N Atlanta, NW & PRASHANT KALAVAR & SHWETA MANJESHWA Address 1720 Redi Rd, Cumming, GA 30040-9740 Delivery details The payment should arrive within 5-7 business days via US Postal Service.

Explanation of payment ∨

P.31

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Log out

FEEDBACK

A Lib	perty Mutual Company		
	Policies		
\$	Billing	>	
Ż	Claims	>	
0	Profile	>	

July 22, 2022*

Paid to **Amount** \$13764.37 PRASHANT KALAVAR & SHWETA MANJESHWA & JPMORGAN CHASE BANK, N.A. ITS

SUCCESSO

Get support

My documents

Address

8030 PRESTWICK CIR, DULUTH, GA 30097-6673

Delivery details

The payment should arrive within 5-7 business days via US Postal Service.

Explanation of payment \vee

*All times and dates are displayed and adjusted for Eastern Time (ET).

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LOCAL RULE 7.1 CERTIFICATE

The undersigned counsel hereby certifies that this pleading was prepared with one of the font and point selections approved by the Court in L.R. 5.1.C. Specifically, Times New Roman was used in 14 point.

ISENBERG & HEWITT, P.C.

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Of Indiana

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

PRASHANT KALAVAR and)
SHWETA KALAVAR,)
Plaintiff,)) CIVIL ACTION FILE NO.
vs.)
)
SAFECO INSURANCE COMPANY)
OF INDIANA)
)
Defendant.)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 25, 2023, she electronically filed a copy of Defendant Safeco Insurance Company of Indiana's Notice Of Removal with the United States District Court's Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys:

Carson Jeffries, Esq.
Carter Jeffries LLC
cjeffries@moldfirm.com

ISENBERG & HEWITT, P.C.

/s/ Hilary W. Hunter Hilary W. Hunter Georgia Bar No. 742696 600 Embassy Row, Suite 150 Atlanta, GA 30328 770-351-4400 - O 770-828-0100 - F **Attorney for Defendant**